

RWC PRIVACY POLICY

INTRODUCTION

The Regional Writing Centre (RWC) is a resource for UL and MIC students writing for academic assessment at third level. Our website is available to the general public, but only UL or MIC students can avail of our WOnline software to make appointments with our peer writing tutors. We provide UL and MIC students with access to peers whose written work consistently receives high scores when submitted for academic assessment. In order to provide these services, we need to continually demonstrate to the upper administration of the university that the RWC is providing the help that students want and that we are accessed by members of the various groups that have been identified as most in need of the resources provided. In order to demonstrate our value, we need to collect information, some of which is protected under the new European General Data Protection Regulation (GDPR), which has been ratified into law.

You provide us with information when you use our online appointment software, WOnline, drop in to speak with a peer writing tutor or attend one of our workshops, seminars or events. When availing of these resources, you consent to the collection, transfer, storage, disclosure, and use of your information as described in this Privacy Policy. See Terms and Conditions.

Your privacy is important to us and we will always treat your personal data with the utmost care. This policy aims to inform you of the personal information that we collect, what we use it for and what your rights are in relation to the information.

INFORMATION THAT WE COLLECT

Contact Information and other identifying information: When you avail of our services, we may ask that you provide us with **a valid email address and/or a username** that may include your personal data. This enables features that are required for our services to operate, such as registration and verification. Where you provide us with **your phone number**, you agree to receive calls or text messages. We may use your number to provide you with notifications and information relating to the service you signed up to. We also ask, in some cases, that you identify **your degree programme, the faculty to which the programme belongs, the module to which you will be submitting your written work, the course or module leader or tutor to whom you are submitting your work, your standing in your programme (year), whether feedback had been provided and if there was any**

accusations of intellectual theft. We ask **your first language**, in some cases, and **whether you were over the age of 23 when you began your programme**, identifying you as a traditional or mature student. All of this information is de-personalised for our semi- and annual reporting to the Centre for Teaching and Learning, UL.

Much of the information above is stored in a database by WCOOnline. There, your information is not shared with anyone other than the three administrators in the Regional Writing Centre (RWC). See WCOOnline's privacy agreement with the RWC: https://26llc.com/doc_privacy.php. WCOOnline synthesises that data to provide the RWC with a report containing statistical, non-personal information that we can use to make our case that we are delivering the resources that students want and ask for and accommodating students that are considered most at risk. These reports are justifications for the RWC's receipt of funding from the university. Occasionally, that statistical, non-personal data will be used to make a case in research articles, as well, on best practices in writing support in academic contexts.

How we share and disclose your information: The information that we share with the Centre for Teaching and Learning (CTL) in our semi-annual and annual reporting includes the number of students making appointments, the number from each of the four faculties, a list of degree programmes and the number from each programme, the number of students availing of the service from first, second, third or fourth year undergraduate programmes, the number from Masters and PhD levels, the number of hour and half-hour sessions that were delivered semi-annually and annually, how many appointments were made during particular times of the day, how many on each day of the week, how many in a month and in a year, how many students each of our tutors talked to, a list of graduation years of those availing of the resource and how many from each graduation year, a list of first or home languages and how many from each language, the kinds of papers students queries about, a list of the kinds of queries students came to us with and some anonymised samples of student feedback on our performance. WCOOnline also supplies us with statistical information about how many hours that tutors were made available compared to how many hours students availed or failed to avail of those available hours. CTL compiles that anonymised, statistical information that we send to them into a report which is posted on their website for public scrutiny: <https://www.ul.ie/ctl/what-we-do/about-ctl/annual-review>

As part of the University of Limerick website, the users of the RWC website are tracked by cookies. The following comes from the University of Limerick's current privacy and cookie statement:

The University of Limerick website uses Google Analytics and AWStats to collect anonymous traffic data to the website to help the University analyse how users use the site. These tools use 'cookies', which are small text files stored on a user's computer. They are used to collect anonymous data on user behaviour and standard Internet activity. The information stored in the cookie is transmitted to the analytics tools and then used to evaluate visitors' use of the website and to compile statistical reports on website activity for University of Limerick. The University will never (nor will enable Third Parties to) use these analytics tools to track or collect any personally identifiable data of visitors to the University of Limerick site. This data is completely anonymous.

Users may also disable cookies from their web browser with no loss of functionality. Technical details in connection with visits to this website may be logged on the University's server for accounting and auditing purposes (e.g. Computer IP number). It is the policy of the University not to disclose such technical information in respect of individual website visitors to any third party unless obliged to disclose such information by a rule of law. The technical information will be used only for statistical purposes. It should be noted that technical details, which the University cannot associate with any identifiable individual, do not constitute "personal data" for the purposes of the Data Protection Act 1988 and Data Protection (Amendment) Act, 2003.

WCOOnline, the appointment software, stores and processes the data the Regional Writing Centre gathers from users of the software. The data processed is statistical and contains no personal information. Their policy states:

We do not collect personally identifiable information about individuals through our sites or programs without the individual's explicit knowledge, and all such information is collected directly from that specific individual.

We use the information we collect from individuals only to allow them to access and use our programs or to service their subscriptions.

We do not sell, share, or distribute in any way any information that we collect, nor do we use such information for any other purpose than explicitly stated here. All information contained in TWENTY SIX DESIGN LLC databases is stored on secure servers solely used and managed by TWENTY SIX DESIGN LLC.

WCOOnline advertises a secure database:

WCONLINE® is an Internet application based on a secure MySQL database and PHP framework. The software itself runs on dedicated, secure, company-owned computer server clusters housed in high security facilities that are redundantly connected to the Internet. What this means for you is that your records are your records--no one else can see them. It also means that you can access your records and schedule at any time and from any Internet-connected computer in the world. No special software, hardware, or server space is needed. And, with an industry-leading ten-year uptime of 99.999% ("five nines"), you can know that your system will be available when you need it.

We take data security extremely seriously. All WCONLINE® installations use industry-standard SSL secured connections and our program, servers, and networking infrastructure are constantly monitored and continually audited by both internal and external security teams. We back-up your data continually, constantly update to match FERPA recommendations, and have the ability to immediately respond to new security threats and advisories. And, since we own all of our own server and networking equipment, your data is never on servers shared with other companies.

Service Providers: We use service providers to provide functions; for example, certain hosting services require us to engage third parties such as WCOOnline, Google Forms, SurveyMonkey or Eventbrite to support service delivery. We may share your information with service providers where necessary and subject to appropriate safeguards to operate the services that you request. These service

providers have their own privacy protection policies that are consistent with our own policy.

https://www.eventbrite.ie/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lg=en_IE

https://www.surveymonkey.com/mp/legal/privacy-policy/?ut_source=gdpr_consent_banner

https://26llc.com/doc_privacy.php

<https://www.heanet.ie/about/policies/privacy-policy>

<https://policies.google.com/privacy/update?hl=en>

We provide various online writing resources on our website. When linking into those sites, you consent to their online privacy policies. If you do not agree, do not access those sites. Our RWC staff will continue to review the privacy policies of all of the sites to which we provide links and remove any that we think might be compromising your rights to privacy. However, each web source that you access is responsible for guarding your privacy and assume responsibility if they fail to do so.

Performance of a contract: Our resource is provided in support of education and research and you can choose whether or not to avail of our resource or any part of our resource. However, when you choose to supply us with personal information, you consent to our privacy policy.

Consent, Instruction and non-personal data: We may share your information when you request or authorise us to do so. We may also share or disclose non-personal, aggregated or pseudonymised data to improve our services, to support ideas or claims made in academic publications on writing or writing pedagogy or to make our case for continued support from the university's administration.

You may unsubscribe from receipt of notifications by following the instructions contained in the notification itself or sending an email to writingcentre@ul.ie. However, we cannot remove people from the UL email system, so you may still receive notifications through *Events@ul.ie* or *All Students@ul.ie*, etc. You have to remove yourself from those groups.

We will not disclose your information to third parties except in the limited circumstances specified in this policy. We rely on a limited number of lawful bases to process your information, including where you have made the information public or where necessary to:

- provide services to you;
- comply with an order of a court or regulator or in relation to a legal claim;
- process information on the basis of your consent, which you may revoke at any time;
- support the purposes of a legitimate interest of UL.

CHANGES TO THIS POLICY AND SECURITY

We may amend this policy from time to time and any amendment will be effective from time of publication on our website unless otherwise notified. By continuing to use our website or services, you agree to be bound by the policy most recently published on our website.

The University of Limerick takes steps to protect your personal information using technical and administrative security measures to mitigate against any risk of loss, misuse, unauthorised access, disclosure or alteration.

See the university's privacy policy here: <https://www.ul.ie/privacy.pdf>

Unfortunately, no method of internet transmission or electronic storage can be guaranteed to be 100% secure. Therefore, while we strive to protect your personal information, the nature of the internet is such that we cannot absolutely guarantee or warrant the security of your personal information.

YOUR RIGHTS

You have the right to request a copy of your personal data, and to have incorrect personal data about you corrected. You also have the right to withdraw your consent for the processing of your personal data, have your personal data erased, or the processing restricted.

Please note that withdrawing consent and requests for restriction/erasure may affect our ability to provide you with the service requested. The RWC will do its best to accommodate those unwilling to share personal data.

Further Information and Contact Details Further information on data privacy rights is available on the University's website www.ul.ie/dataprotection and the website of the Data Protection Commissioner www.dataprotection.ie. Please contact the Information and Compliance Office at the University of Limerick on queries relating to the processing of personal data on this Website. Email: dataprotection@ul.ie or Phone: 061 234393.

You also have the right to lodge a complaint with the Data Protection Commissioner and can access guidance on making a complaint at www.dataprotection.ie.