

PRIVACY NOTICE

EACHTRAÍ UISCE TEO

T\A COLÁISTE UISCE

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1 General

Eachtraí UISCE Teoranta, T/A Coláiste UISCE and UISCE is committed to protecting all personal and special categories of data held on you.

For data protection purposes, Eachtraí UISCE Teoranta T/A Coláiste UISCE and UISCE is the controller and responsible for your personal data.

As such, Coláiste UISCE wants you, the 'data subject', to understand how Coláiste UISCE collects, uses, stores, and shares your personal data. Coláiste UISCE also wants you to understand what rights you can invoke to help you to protect your privacy. In this regard, it is important that you read this Privacy Notice and understand how Coláiste UISCE uses your personal data. Please note that Coláiste UISCE reserves the right to update this Privacy Notice as required. The most recent version of this document can be found on Coláiste UISCE's website <https://uisce.ie/>

1.1 Coláiste UISCE Information

Coláiste UISCE is an Irish college and adventure centre. Coláiste UISCE provides Gaeltacht Irish language courses with adventure sports, activity tours and team-building courses. Services are provided in a purpose built centre and activities are provided in locations near the site. Courses are also provided in a second site in Aughleam. Food and accomodation are also provided.

If you wish to locate further information on Coláiste UISCE, you can find this on the UISCE website through the following link: <https://uisce.ie/>

1.2 Legislation

All personal data processed by Coláiste UISCE is done so in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

1.3 Queries and Complaints

If you are unhappy with the way Coláiste UISCE handles your personal data and wish to complain, or if you simply want further information about the way your personal data will be used, please contact Coláiste UISCE at the address below:

Data Protection Officer

Coláiste UISCE

Cuan Eilí,
O.P. an Chlochair,
Béal an Átha,
Co. Mhaigh Eo
Email: eolas@uisce.ie

You have the right to lodge a complaint with the Data Protection Commission. To contact the Data Protection Commission, please use the following details:

Data Protection Commission

21 Fitzwilliam Square South

Dublin 2

D02 RD28

Ireland

Telephone: +353 (0)761 104 800

Telephone: +353 (0)57 868 4800

Email: info@dataprotection.ie

1.4 Breaches

Coláiste UISCE will take all appropriate technical and organisational steps to safeguard your personal data. In the unlikely event of a data breach, Coláiste UISCE will contact you in line with Coláiste UISCE's legal obligations.

2 How Does Coláiste UISCE Collect Information?

Coláiste UISCE collects personal data to enable the provision of services to support the Coláiste UISCE purpose. The following non-exhaustive methods of data collection are an indication of ways in which Coláiste UISCE may obtain your information:

- Obtain personal data directly from you when you register for a course;
- When you apply for work as an employee or bean/fear an tí;
- Through the use of 'cookies' when the Coláiste UISCE website is used;
- Personal data that Coláiste UISCE receives from other sources eg schools or third parties when scholarships are awarded; and
- Sales and Marketing events, online and social media competitions
- When entering Coláiste UISCE's premises, you will be recorded on CCTV surveillance for security purposes.

It is important that the personal data you provide Coláiste UISCE is up to date and accurate. As outlined in Section 7.4 of this notice, if personal data Coláiste UISCE holds on you is inaccurate or incomplete, please contact Coláiste UISCE and Coláiste UISCE will update the information.

3 What Does Coláiste UISCE Use Information For?

3.1 Process, Purpose, and Lawful Basis

Coláiste UISCE uses personal data collected to fulfil Coláiste UISCE's obligations;

- in the organisation of and the day to day running of courses to enable the provision of services to support Coláiste UISCE's purpose;
- to inform you of courses/events/meetings etc;

Coláiste UISCE uses personal data for any of the following purposes:

| Process | Purpose | Lawful Basis |
|---|---|---|
| Course Bookings and enrolments | Enrolling students on our courses | Processing is necessary in order to ensure proper enrollment of students so the necessary information is available to organize our students and classes for each course and to make sure that relevant staff and departments are aware of specific needs of customers (e.g. specific health, dietary, educational needs etc). |
| Class Roll books, Course Daily Briefing sheets and Daily Accommodation reports | Monitoring the attendance and wellbeing of students during courses | Processing is necessary in order to ensure the attendance and wellbeing of our students at the classes and in their accommodation |
| Disciplinary System and Incident reporting | Maintaining comprehensive records for the purpose of incident management and reporting | Processing is necessary in order to ensure the safety and wellbeing of our students at the classes and in their accommodation. |
| Training Records | To ensure that Coláiste UISCE is in a position to assess the data subject's training needs and to capture proof of training and to evaluate data subjects based on their course performance in order to assess suitability for future positions in the company. | The processing is necessary for the performance of contract to which the data subject is party. |
| Accidents and Incidents | To enable Coláiste UISCE to comply with employee record keeping obligation pursuant to the Safety, Health, and Welfare Act 2005. | Processing is necessary for compliance with a legal obligation to which the Coláiste UISCE is subject and for reporting to our insurance company. |

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| Pre-Recruitment | To register a prospective data subject's interest in recruitment for employment. | Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract. The processing is necessary for the exercise of rights and obligations under employment law. |
| Background Checks | To verify if the data subject is qualified and eligible for certain positions within Coláiste UISCE. | Processing is necessary for compliance with a legal obligation to which Coláiste UISCE is subject. |
| Recruitment and Selection | To complete the recruitment process and assess data subject suitability. | Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract. Processing relates to Coláiste UISCE's obligations in employment and for assessing data subject's work capacity. |
| Pension | To administer data subjects pension entitlements and to comply with pension rules. | To comply with various pension laws. Processing is necessary for the performance of a contract to which the data subject is party. |
| Payroll | To enable Coláiste UISCE to effect payment to the data subject. | Processing is necessary for the performance of a contract to which the data subject is party. |
| Personnel File | To comply with employment and revenue laws and to ensure that terms and conditions of employment are adhered to. | Processing is necessary for the performance of a contract to which the data subject is party. To comply with various employment and revenue laws. To protect the vital interests of the data subject in the event of an accident or emergency. |
| Entitlement to Work | To enable Coláiste UISCE to achieve compliance with its obligations | Processing is necessary for compliance with a legal obligation to which Coláiste UISCE is subject. |

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| | pursuant to any local legislation governing the entitlement to work. | |
| Time and Attendance Records | To enable the data subject to avail of their rights and entitlement pursuant to the Organisation of Working Time Act 1997. | The processing is necessary for the performance of contract to which the data subject is party. |
| Statutory Entitlement | To enable Coláiste UISCE to achieve compliance with: <ul style="list-style-type: none"> • Its obligation to the data subject; • Record keeping obligations pursuant to a variety of employment law statutes. | The processing is necessary for compliance with legal obligation to which Coláiste UISCE is subject. |
| Performance Details | To manage the data subject's performance in accordance with relevant Coláiste UISCE policies. | The processing is necessary for the performance of contract to which the data subject is party. |
| Grievance and Disciplinary | To ensure the data subject's complaints are fairly investigated in accordance with Coláiste UISCE policies. | To comply with Coláiste UISCE's legal obligation to apply fair procedures to any data subject's investigation. The processing is necessary for the performance of contract to which the data subject is party. |
| Medical Information | To manage the data subject's absences, to manage sick pay in accordance with the contract of employment, and to manage the fitness to work of data subjects. | Processing is necessary to assess, subject to data subject safeguards, the working capacity of the data subject. To carry out obligations and exercise rights under employment law. |
| Making or Receiving Payments | To make or receive any payments in the discharge of normal business functions, dispute settlement, or to carry out any other payment requirements. | Processing is necessary for compliance with various employment and revenue laws. The processing is necessary for the performance of contract to which the data subject is party. |
| Voice of the Customer | To obtain the data subject's feedback by survey on the Coláiste UISCE | Processing is based on request of consent which will be taken from the data subject. |

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| | recruitment processes, client services and for research purposes. | |
| Attracting Talent | To provide support and assistance on recruitment services to data subjects via third party sources, such as LinkedIn and other job sites, from which Coláiste UISCE obtain personal data. | Processing is based on legitimate interest. |
| Supporting Talent | To support data subjects in their career guidance and communicate with them directly with useful information, advice, and support materials through email, messaging, or mobile/web notification. | Processing is based on legitimate interests and contractual obligations. |
| Regulatory Compliance | To comply with financial regulations and any other relevant laws and regulations. | <p>Processing is necessary for compliance with a legal obligation to which Coláiste UISCE is subject.</p> <p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> |
| Third Party Data Sharing | To allow Coláiste UISCE to conduct and carry out functions with third party service providers that enable Coláiste UISCE to deliver services. | Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. |
| Back-ups | To store personal data and make back-ups of that data in case of emergencies and for disaster recovery purposes. | Processing is necessary for compliance with a legal obligation to which Coláiste UISCE is subject. |
| Evidence Submissions | To gather information for dispute resolution services and legal proceedings. | Processing is necessary for compliance with a legal obligation to which Coláiste UISCE is subject. |
| Transfer of Information for Parties Legal Proceedings | To allow parties to commence legal proceedings. | Processing is necessary for compliance with a legal obligation to which Coláiste UISCE is subject. |

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| CCTV systems | For the security, health, and safety of individuals on Coláiste UISCE premises. | Processing is based on legitimate interest and is necessary for compliance with a legal obligation to which the Coláiste UISCE is subject. |
| Cookies | Coláiste UISCE uses cookies in a number of ways to enhance your experience on our site, including: <ul style="list-style-type: none"> • Keep you signed in; • Understand how you use the site | You can choose settings on your browser without choosing cookies, allaboutcookies.org explains how to remove cookies from your browser. However, some items on our site may not function without cookies. Privacy Policies on other sites: The Coláiste UISCE site has links to other sites. Our privacy policy applies to our site only, so if you visit another site, you should read their privacy policy. |

4 Who Does Coláiste UISCE Share Information With?

Coláiste UISCE may share personal data with other parties in the course of Coláiste UISCE's duties. When this is done, Coláiste UISCE adheres to the following principles:

- Coláiste UISCE, as a Data Controller, will not sell your data to any third party and will take all appropriate steps to ensure the security of your data in dealings with third parties.
- The transfer is based on a legal obligation, the performance of a contract, or explicit consent.
- Where data is transferred to another party, Coláiste UISCE ensures appropriate technical and organisational safeguards are used to protect your personal data.
- Where Coláiste UISCE engages a third party to provide a service to Coláiste UISCE, Coláiste UISCE ensures the provider has taken appropriate technical and organisational measures to process, store, and safeguard your personal data.

While the parties Coláiste UISCE engage may change occasionally, Coláiste UISCE believe it is important that you are aware of the types of parties Coláiste UISCE shares data with. The categories and types of third parties outlined below is a non-exhaustive list but provides an indication of the parties Coláiste UISCE shares data with.

4.1 Other Third Parties

Third parties for the purposes of internal and external audits, carrying out research, and or third parties who may improve Coláiste UISCE's processes and services such as consultants and marketing and surveying platforms such as *allchemer* and *survey gizmo*. They also include governing bodies such as Roinn na Gaeltachta, the Department of Education, the Irish Sailing Association and CONCOS.

4.2 Government Departments, Bodies or Agencies

Coláiste UISCE is legally obligated to share personal data with state actors which is outlined in the Data Protection Act 2018.

Recipients of this data include Government departments, agencies, bodies, investigatory bodies, local authorities, TUSLA and the Gardaí.

5 What Type of Information is Collected?

To fulfil Coláiste UISCE's mandate and perform tasks as outlined in this statement, Coláiste UISCE needs to collect various types of personal data.

While the type of personal data may change occasionally, Coláiste UISCE believes it is important you are aware of the types of data Coláiste UISCE gathers and uses. The following table is a non-exhaustive list and provides an indication of the categories and types of data Coláiste UISCE uses to perform Coláiste UISCE's tasks.

Please note that information listed under one category may be used for the performance of a task or in relation to activities under another heading or as outlined under Section 3.

| Category | Type of Data |
|-----------|---|
| Students | <ul style="list-style-type: none">Name, date of birth, phone number, address, sex, email address, education details, next of kin, CCTV footageMedical data, health / medical declarations.Parents information; first name, last name, address, contact details, email addressSpecific needs/requirement eg: educational, emotional, religious, friends etc)Incident, Accident, Disciplinary and behavioural records |
| Employees | <ul style="list-style-type: none">First name, last name, date of birth, address, contact details, email address, family details, financial, tax, pension, remuneration details, performance details, visual images |

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| | <p>details, employee ID, CCTV footage, lifestyle and social circumstances, education, and training details, grievance and disciplinary documents such as incident reports and complaints.</p> <ul style="list-style-type: none"> • Special data such as medical checks, medical records, sick leave details. • Criminal data such as garda vetting documents. |
| Other Stakeholders | <ul style="list-style-type: none"> • Contact details, first name last name, email address, images, bank details and payment details. |

6 How Long Does Coláiste UISCE Retain Information?

Coláiste UISCE has developed a record retention schedule for all the personal data Coláiste UISCE holds. Each retention period varies dependent on the nature and the purpose of the processing.

The main factors which determine retention periods are as follows:

1. How long it is required to perform the task;
2. Any legal requirements to hold onto the data;
3. Any pending legal actions.

If you would like to see a copy of the Retention Policy, please contact the DPO at eolas@uisce.ie

7 What Are Your Rights?

As a data subject, you will have the following rights as outlined in this section 7. **However, restrictions may apply in certain situations.**

7.1 Where do I send requests?

Please send all your requests to the contact details provided in Section 1, with as much detail as possible about your requirements to allow Coláiste UISCE to deal with your request efficiently. To answer your request, Coláiste UISCE may ask you to provide identification for verification purposes.

7.2 How long will a request take?

Upon receipt of a request, Coláiste UISCE will have 30 days to provide an answer with an extension of two further months if required. If Coláiste UISCE requires more time to deal with your request, Coláiste UISCE will notify you of the delay and the reasons behind it within 30 days of the receipt of the request. If Coláiste UISCE refuses your request, Coláiste UISCE will

also notify you within 30 days of the receipt of the request accompanied by the reasons for the refusal.

Coláiste UISCE will not charge a fee for any requests, provided Coláiste UISCE does not consider them to be unjustified or excessive. If Coláiste UISCE considers these to be unjustified or excessive, Coláiste UISCE may charge a reasonable fee (also applicable for multiple copies) or refuse the request.

You are entitled to contact the Data Protection Commission if Coláiste UISCE refuses your request.

7.3 Right of Access

You have a right to know what personal data Coláiste UISCE hold on you, why Coláiste UISCE holds the data, and how Coláiste UISCE is processing your personal data.

When submitting your request, please provide Coláiste UISCE with information to help verify your identity and provide as much detail as possible to help Coláiste UISCE understand the information you wish to access (i.e. date range, subject of the request) and email eolas@uisce.ie.

Please note that an access request is free of charge, however, where Coláiste UISCE determines a request to be unjustified or excessive, Coláiste UISCE may charge you a reasonable fee.

7.4 Right to Rectification

You have a right to request that Coláiste UISCE information held on you is up to date and accurate.

Where information is inaccurate or incomplete, Coláiste UISCE encourage you to contact Coláiste UISCE to have this information rectified. Upon receipt of request, Coláiste UISCE will ensure that the personal data is rectified and as up to date as is reasonably possible.

7.5 Right to be Forgotten

You have the right to seek the erasure of your personal data in the following circumstances:

- The personal data is no longer required for the purposes for which it was obtained;
- Where data is being processed on the basis of consent, you withdraw consent to the processing and no other lawful basis exists;
- The personal data is being unlawfully processed;
- You object to the processing of personal data and there are no overriding legitimate grounds for the processing;
- Your personal data requires deletion in line with legal requirements.

However, Coláiste UISCE will be unable to fulfil an erasure request if the processing of personal data is necessary for the following:

- Exercising the right of freedom of expression and information;
- Compliance with a legal obligation or for the performance of a task carried out in public interest;
- Reasons of public interest in the area of public health;
- Archiving or statistical purposes in the public interest;
- The establishment, exercise, or defence of legal claims;

Please note that where the legal basis for Coláiste UISCE's processing of personal data is on the basis of a legal obligation, some processing in relation to your data may not be subject to the right to erasure.

To determine your request for erasure, Coláiste UISCE will carry out an assessment of the justification for the retaining your personal data where a legal requirement applies and contact you if Coláiste UISCE is unable to fulfil your request.

Please be aware that in some circumstances Coláiste UISCE may need to retain some information to ensure all your preferences are properly respected. For example, Coláiste UISCE cannot erase all information about you where you have also asked Coláiste UISCE not to send you marketing material. Otherwise, Coláiste UISCE would delete your preference not to receive marketing material.

7.6 Right to Restriction

You have the right to restrict the extent of personal data processed by Coláiste UISCE in circumstances where:

- You believe the personal data is not accurate (restriction period will exist until Coláiste UISCE updates your information);
- The processing of the personal data is unlawful, but you wish to restrict the processing of data rather than erase it;
- Where the personal data is no longer required by Coláiste UISCE, but you require retention of the information for the establishment, exercise, or defence of a legal claim;
- You have a pending objection to the processing of the personal data;

When processing is restricted, your personal data will only be processed: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of other people; or for reasons important to public interest.

Coláiste UISCE will contact you to confirm where the request for restriction is fulfilled and will only lift the restriction after Coláiste UISCE has informed you that Coláiste UISCE is doing so.

7.7 Right to Data Portability

You have the right to the provision of all personal data held in relation to you in a structured, commonly used and machine-readable format where:

- Processing is completed on the basis of a contract;
- Processing is completed based on consent by you;
- Processing is carried out by automated means.

You may also request that Coláiste UISCE sends this personal data to another data controller where technically feasible.

7.8 Right to Object

You have the right to object to the processing of your personal data; however, the processing must have been undertaken on the basis of public interest or legitimate interest by Coláiste UISCE.

If you wish to object to the processing of data, please contact Coláiste UISCE with your request. Coláiste UISCE will then stop the processing of personal data unless it is required for legal proceedings.