

LORETO CENTRE, CRUMLIN
DATA PROTECTION POLICY

Approved 18th June 2018

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Introduction

Privacy and data protection rights are very important to the Loreto Centre, Crumlin

Loreto Centre, Crumlin collects and processes personal information relating to its members¹, workers, contractors, volunteers (hereafter referred to as 'staff'), and funders in order to carry out its administrative and statutory functions. Data Protection legislation safeguards the privacy rights of individuals in relation to the processing of personal data.

Loreto Centre, Crumlin is both a data controller and a data processor, and undertakes that all processing and use of personal data will be in accordance with the obligations of relevant data protection legislation, i.e. *EU General Data Protection Regulation (EU) 2016/279* (known as 'GDPR'), (which will supersede Data Protection Act 1988, Data Protection (Amendment) Act 2003).

Any inquiries about this Data Protection Policy should be made to the Manager Loreto Centre, Crumlin, Dublin 12 or to loretocentrecrumlin@eircom.net.

Purpose

This policy is a statement of Loreto Centre, Crumlin's commitment to protect the rights and privacy of the personal data of individuals in accordance with GDPR.

Review

This Data Protection Policy will be reviewed regularly in light of any legislative or other relevant developments.

This policy was approved by the Board of Management on **18th June 2018**

This policy will be reviewed within 12 months of approval.

¹ Please note that the terms "Member" and "Board Members" are interchangeable.

Data Protection Principles & Compliance

Loreto Centre, Crumlin will comply with the following principles outlined in GDPR for the collection and processing of personal data:

1. Lawful, Fair and Transparent Processing

Loreto Centre, Crumlin will obtain and process personal data with the consent of the data subject or on a clear legal basis and must clearly state the purpose and by whom personal data is processed. The processing of personal data may be necessary for the performance of the contract of employment, and care of clients. Any information which falls under the definition of personal data and is not otherwise exempt will remain confidential and will only be disclosed to third parties with appropriate consent. (See [Loreto Centre, Crumlin Personal Data Consent Form](#))

Sensitive Personal Data

Loreto Centre, Crumlin is required to process sensitive personal data. GDPR defines sensitive personal data as data relating to medical information, gender, religion, race, sexual orientation, trade union membership and criminal records and proceedings.

2. Specified and Lawful Purpose

Personal data will only be kept for purposes that are specific, lawful and clearly stated.

Loreto Centre, Crumlin collects and uses personal data within the Centre for the following purposes:

- For the purpose of delivering adult community education and psychotherapy,
- To provide personnel, payroll and pension administration services
- To perform accounting and other record-keeping functions
- To communicate the work of the Loreto Centre (e.g. Annual Report and Brochures)
- To manage information resources (e.g. access to our archival collections)

Where Loreto Centre, Crumlin engages a **third party** to provide services on its behalf, and where this service requires the service provider to process personal data, Loreto Centre, Crumlin is required by law to have a written contract (a data processing contract) in place with the service provider. At a minimum this contract must provide sufficient guarantees with regard to data protection compliance, including guarantees concerning the safety and security of data, auditing rights, cooperation concerning the rights and freedoms of Data Subjects, etc. Before any such contract is agreed it shall be submitted to the Board of Management for approval.

Rights of Access to Information

Data subjects have the right of access to information held by Loreto Centre, Crumlin, subject to the provisions of GDPR. Any data subject wishing to access their personal data should put their request in writing to the Manager. Loreto Centre, Crumlin will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event, within one month. For further information please consult Loreto Centre, Crumlin [Data Subject Access Request Forms & Procedures](#).

3. Minimisation of Processing

Personal data collected will be adequate, relevant and processed only as is necessary to comply with the purposes for which it was first collected.

4. Accuracy

Personal data must be kept accurate and where necessary up to date. Any incorrect data will be rectified or deleted if it is known to be erroneous or obsolete. Loreto Centre, Crumlin will endeavour to ensure that all personal data is accurate. Data subjects must notify the data processor of any changes to information held about them. (See [Data Subject Access Policy & Procedures](#).)

5. Storage Limitation

Personal data will be kept for no longer than is necessary for the original purpose for which it was obtained or processed. Loreto Centre [Records Retention Policy](#) outlines the length of time for which material should be kept. Some personal data may be kept permanently as archives, for statistical, scientific and historical research purposes or if it is in the public interest.

6. Security and Confidentiality

Personal data will be kept safe and secure. Loreto Centre, Crumlin is responsible for ensuring adequate security structures to prevent unlawful or inadvertent processing, alteration or loss of the data. This will include ensuring the security of the premises, filing cabinets, clean desk policy as well as the safeguarding of electronic data through encryption and password protection. In the event of a breach of personal data Loreto Centre, Crumlin will manage it in accordance with Loreto Centre, Crumlin [Personal Data Breach Policy & Procedures](#).

7. Liability and Accountability

Loreto Centre, Crumlin as both Data Controller and Data Processor will be required to demonstrate their compliance with the GDPR. This can be achieved through implementation of policies, guidelines and organisational training.

Further, detailed information on how Loreto Centre, Crumlin will ensure compliance with these principles can be found in the:

- [Loreto Centre, Crumlin Data Protection Guidelines](#)
- [Loreto Centre, Crumlin Personal Data Consent Form](#)
- [Loreto Centre, Crumlin Personal Data Breach Policy & Procedures](#)
- [Loreto Centre, Crumlin Data Subject Access Request Forms & Procedures](#)
- [Loreto Centre, Crumlin Privacy Notices](#)
- [Loreto Centre, Crumlin Records Retention Schedule](#)

Responsibility

Loreto Centre, Crumlin Board of Management has overall responsibility for ensuring compliance with GDPR and all other relevant data protection legislation. However, all staff and volunteers who separately collect, control or process the content and use of personal data are individually responsible for ensuring compliance with GDPR and all other relevant data protection legislation.

Loreto Centre, Crumlin Board of Management will ensure that all appropriate support, assistance, advice and training is provided to all offices, members and staff to ensure compliance with the legislation.

Best practice guidelines, policies and procedures have been prepared to assist staff and members in dealing with data protection issues in all aspects of their work.

Loreto Centre, Board of Management undertakes to review the Data Protection Policy and other relevant policies at regular intervals in order to ensure compliance with GDPR.

Procedures and Guidelines

Loreto Centre, Crumlin is firmly committed to ensuring personal privacy and compliance with all data protection legislation. In order to ensure the implementation of this policy and compliance, the following policies, procedures and guidelines have been prepared, and must be adhered to by all staff.

The following policies and procedures are available to all members and staff:

- **Loreto Centre, Crumlin Data Protection Policy**
- **Loreto Centre, Crumlin Data Protection Guidelines**
- **Loreto Centre, Crumlin Personal Data Consent Form**
- **Loreto Centre, Crumlin Personal Data Breach Policy & Procedures**
- **Loreto Centre, Crumlin Data Subject Access Request Forms & Procedures**
- **Loreto Centre, Crumlin Privacy Notices**
- **Loreto Centre, Crumlin Records Retention Schedule**

For Further Information

Any inquiries about this Data Protection Policy should be made to: The Manager, Loreto Centre, Crumlin, Dublin 12 D12 KW66

This policy document will be reviewed and updated as required in line with any legislative or other relevant development.