

## **Donahies Community School Adult Education Privacy Policy**

### **1. What Personal Data We Collect:**

**1.1** When you register with us as a student, you will be required to provide your name, address, phone number, gender and email address. Students registering for QQI courses will be asked to supply their date of birth and PPS Number in the weeks following registration.

**1.2** If applying to the school for Garda Vetting for work experience relating to QQI Childcare and Health Care Skills, you will also be asked to fill in a separate form requesting your full name, address, date of birth, email and phone numbers.

**1.3** Your attendance/non-attendance at class is recorded in every class by the tutor.

**1.4** Students paying over the phone using debit/credit cards will be asked to supply their credit/debit card number, expiry date, name on card and cvv number and these will be uploaded to a third-party website dealing with online payments.

**1.5** CCTV is in operation on the school premises and in the school buildings so recordings of your entrance/exit of the school buildings and premises are recorded.

### **2. Why we collect your data:**

**2.1 Registration & Attendance:** The information listed above is collected at registration in order to supply a class list to the tutor for the purposes of recording attendance. Addresses are collected in order to be able to post you out any relevant information concerning the course you are signed up for. We use your mobile phone number and email address to inform you of any cancellation/change to classes which may occur during the school term. If the tutor decides to put on an extra few classes or make any changes, you may also be texted/emailed to inform you of this. Email addresses are used to send you out an automated receipt of payment and

registration for any course you have signed up for and paid. Emails may also be used to send you out any supplementary information regarding your course such as a list of course materials, booklists etc and our brochure. Your gender is used purely for statistical purposes for our annual returns to the Department of Education & Skills.

**2.2 QQI Exam Results Entry:** Students who have registered for QQI courses will need to be registered on the QQI database if they wish to receive their official exam results and QQI certificate awards. In order to register you on the QQI Database, we need to enter your Name, Address, Date of Birth and PPS Number. Without these, we cannot register you with QQI.

**2.3 Garda Vetting:** Students looking to apply for Garda Vetting in order to fulfil work experience elements of QQI and other certified courses are required to fill out an NVB1 form. This form is used by the Association of Community and Comprehensive Schools (ACCS) to initiate your Garda Vetting process.

### **3. How we collect your data:**

**3.1 Registration:** Most personal data is provided by students on their application forms when registering in the office or through the online registration system. (QQI courses only: Garda Vetting NVB1 forms are distributed to the relevant students by members of the Adult Education Department and are returned to the Adult Education Office when completed. QQI forms will be issued to students by members of the Adult Education team at some stage during the course and completed forms will be returned to the Adult Education Office.)

**3.2 CCTV:** Your image may be recorded via closed circuit television (CCTV), which has been installed on the school premises and inside the school building. The system comprises of a number of cameras installed at reception and at each entrance and exit, and some corridors recording video images, some may have sound. Our basis for collecting personal data in this way is our legitimate interest (Article 6.1(f) of GDPR) in the security of our people and premises; to provide evidential material for

criminal court proceedings. There is signage in place to inform people that CCTV is in operation.

**3.3 Telephone:** We have a telephone voice messaging system in the office to record any messages from people who ring when the office is unattended. You may or may not wish to leave a message. Messages are deleted once a member of the Adult Education Department has listened to it and followed up on any information left on the system.

#### **4. Third-Party Websites:**

**4.1** This Policy does not apply to any links on our website to third-parties' websites and/or services, such as third-party applications, that you may encounter when you use our website. You should be aware that the service that we provide may enable or assist you to access the website content of, correspond with, and pay for services via third-party websites and that you do so solely at your own risk. A specific example is that of credit/debit card payments to the Adult Education Department.

**4.2** The Adult Education Department has no liability or obligation in relation to the content or use of, or correspondence with, any such third-party website, or any transactions completed, and any contract entered into by you, with any such third party and the use by any such third-party of your personal data. We do not endorse or approve any third-party website nor the content of any of the third-party website made available via our website. We encourage you to carefully familiarize yourself with terms of use and privacy policies applicable to any websites and/or services operated by third parties. Please be aware that we are not responsible for the privacy practices of any third parties.

#### **5. How we protect your data:**

**5.1** Access to our online databases is password protected and all our computers are also password protected. We restrict access to personal data to employees, contractors and agents who need to know such personal data in order to operate, develop or improve the services that we provide. We ensure that we have appropriate physical and

technological security measures to protect your information; and we ensure that when we outsource any processes that the service provider has appropriate security measures in place. All our documentation and records are securely stored on site.

- 5.2** We will implement appropriate technical and organisational measures to ensure a level of security appropriate to the risks that are presented by the processing of your personal data. In particular, we will consider the risks presented by accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.
- 5.3** Please note that the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of any data transmitted to our website, or to our office via email, and any such transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. We are not responsible for any delays, delivery failures, or any other loss or damage resulting from (i) the transfer of data over communications networks and facilities, including the internet, or (ii) any delay or delivery failure on the part of any other service provider not contracted by us, and you acknowledge that our website may be subject to limitations, delays and other problems inherent in the use of such communications facilities. You will appreciate that we cannot guarantee the absolute prevention of cyber-attacks such as hacking, spyware and viruses. Accordingly, you will not hold us liable for any unauthorised disclosure, loss or destruction of your personal data arising from such risks. Please also note that our website contains hyperlinks to websites owned and operated by third parties, and use of these is at your own risk (see ‘Third Party Websites’)
- 5.4** When the Adult Education Department engages third parties to process personal data on its behalf, it will ensure that such third parties are subject to a legal contract, which provides at least the level of data protection security set out in Data Protection Legislation.

## **6. Who we share your data with:**

- 6.1** All our student registration details and debit/credit card payments are done through Easy Payments Plus, operated by FeePay, Ltd. which is our data processor. A copy of their privacy policy can be found here: <http://www.easypaymentsplus.com/epp-solutions/privacy-policy/>
- 6.2** The Adult Education Department shares data annually with the Department of Education & Skills (DES). The information we share with the DES is anonymised and you personally cannot be identified. This sharing of information is for statistical purposes.
- 6.3** Students who fill out the Garda Vetting NVB1 forms consent to their information being shared with ACCS, who act as agents for the Garda Vetting Bureau.
- 6.4** Your attendance record may be shared with an insurance company in the event of any query relating to an insurance claim being made by you against the school.

## **7. Direct Marketing**

- 7.1** When you clicked to receive email receipt, you also gave consent to receive direct marketing via email. We will not send out more than three direct marketing emails per school year. You can update your preferences and opt out of this at any stage in your profile settings or contact us via email or through the office and we can do it for you.

## **8. Changes to this Policy:**

- 8.1** This Policy may be updated from time to time, so you may wish to check it each time you submit personal information to us. Any material changes to this Policy will be posted on the Adult Education page of the school website.

## **9. Data Subject Requests:**

**9.1** Under Articles 13 and 15 of GDPR, on your request we will confirm if we are keeping your personal data and provide it to you in a transparent and easily accessible form

**9.2** The Adult Education Department will process data subject access requests that meet certain formalities:

- requests must be in writing;
- the Adult Education Office is entitled to make reasonable enquiries to satisfy itself about the identity of the person making the request to ensure that we are not disclosing personal data to a party who is not entitled to it under GDPR;
- the person requesting must supply a reasonable level of appropriate information to help us to locate the information required (where it concerns a recorded image, they should also provide a passport-sized photo of themselves); however, no reason for the request needs to be provided

## **10. Contact Us:**

**10.1** As data controller (as defined in Data Protection Legislation) for your personal data collected as set out in this Policy, the Donahies Community School Adult Education Department is located at Donahies Community School, Streamville Road, Dublin 13.

**10.2** Should you need to contact us about any of your rights in this policy, please submit a written request to the Adult Education Department, Donahies Community School, Streamville Raod, Dublin 13 or email donahiesadulted@gmail.com

**10.3** The contact details for our Data Protection Officer is Gemma O'Connor, Phone: 01-8482217