



## **Data Protection Policy**

### **1 Policy Statement**

Exchange House Ireland needs to gather and use certain information about individual. These can include clients, service users, suppliers, customers, contacts, employees and other people the organisation has a relationship with or may need to contact.

Exchange House Ireland is committed to protecting the rights and privacy of individuals in accordance with the Data Protection Acts.

This policy describes the key responsibilities of the Exchange House Ireland and its staff in the collection, processing and retention of individuals' personal data.

### **2 Key Responsibilities**

The Data Protection Acts set out 8 key responsibilities in relation to the information which organisations keep on computer or in a structured manual file about individuals.

1. Obtain and process the information fairly
2. Keep it only for one or more specified and lawful purpose
3. Process it only ways compatible with the purposes for which it was given to you initially
4. Keep it safe and secure
5. Keep it accurate and up-to-date
6. Ensure that it is adequate, relevant and not excessive
7. Retain it no longer than is necessary for the specific purpose or purposes
8. Give a copy of his/her personal data to any individual on request

#### **2.1 Fair obtaining**

- At the time when we collect information individuals are to be made aware of the uses for that information
- People are to be made aware of any disclosures of their data to third parties
- People's consent for any secondary uses of their personal data must be obtained, especially in cases where this might not be obvious to them
- Our practices must be as open, transparent and up-front to individuals

#### **2.2 Purpose specification**

- The purposes for keeping personal information must be made clear, especially to those individuals on our database
- Processing of data must be in a manner compatible with these purposes

#### **2.3 Use and disclosure of information**

- Personal data will only be disclosed when it is deemed necessary for the purpose(s) or compatible with the purpose(s) for which it collects and keeps the data

- If necessary consent should be obtained from the individuals whose data maybe disclosed.

## **2.4 Security**

- Each service department is responsible for ensuring personal data is properly secured, either electronically or in manual files.
- In the case of manual files, documents must be secured in lockable filing systems, with keys maintained by assigned individuals. Keys must not be given to non-assigned persons
- In the case of electronic files, all computers, laptops, mobile phones, tablets, or other means of accessing personal data must be password protected.

## **2.5 Adequate, relevant and not excessive**

- Staff members are required to ensure that all the information collected serves the purpose for which it was collected effectively, and to deal with individuals in a fair and comprehensive manner
- They must also ensure that all the information collected is relevant, and not excessive, for the specified purpose. Non-relevant data must not be collected nor maintained

## **2.6 Accurate and up-to-date**

- Staff must ensure data is kept as up-to-date as possible.
- Personal data can be time-sensitive, i.e. likely to become inaccurate over time unless it is updated and this must be monitored
- Support for this activity will be provided by the service managers

## **2.7 Retention time**

- Data may only be retained for as long as is necessary, or the activity is completed, for the specific purpose for which it was obtained
- Certain funders may require records to be retained for a certain period of time. It is important that people are to be made aware that data they are giving at the time is to be held for this certain period due to funder's constraints.
- Data bases are to be regularly purged of data which is no longer needed, such as data relating to former clients or staff members. This is the responsibility of each department.

## **2.8 The Right of Access**

- The co-ordinator and compliance officer has responsibility for handling data requests
- The procedure for dealing with such requests is outlined in Appendix XX below (to be drawn up when GDPR comes into force)
- Individuals can ask Exchange House Ireland to justify every piece of information held about them

## **3 Training & Education**

- All employees and volunteers are to be made aware of this policy and sign a declaration of their understanding and responsibilities
- All employees and volunteers are to receive some data protection training/instruction (in-house or externally)

- If or when new data protection legislation is enacted all employees and volunteers are to receive relevant training/instruction.

#### **4 Co-ordination and Compliance**

The organisation will appoint a data protection co-ordinator and compliance officer. The roles and responsibilities of the officer are as follows:

##### **4.1 Data Protection**

- Involvement in all issues relating to the protection of personal data within Exchange House Ireland
- Monitor compliance with the General Data Protection Regulation (GDPR)
- Advising the CEO on carrying out data protection impact assessments (DPIAs) as required by the GDPR
- Informing and advising the organisation and its employees and volunteers who carry out data processing of their obligations under the GDPR and any relevant national data protection provisions
- Co-operate with the relevant data protection authority, where necessary
- Act as the contact point for the relevant data protection authority on issues relating to processing
- Act as the contact point for data subjects of Exchange House Ireland in relation to all issues regarding the processing of their personal data and to the exercise of their rights under the GDPR including facilitating and managing Subject Access Requests (SARs)
- Assist with or maintain records of processing operations under its responsibility and/or categories of processing operations carried out [Data Mapping]
- Deliver appropriate data protection/privacy training to staff and providing them with relevant policy and procedure updates
- Champion adherence to Exchange House Ireland's records management policy and delivering appropriate training and relevant updates

##### **4.2 Compliance**

- Manage and maintain Exchange House Ireland's Freedom of Information (FOI) service to ensure all statutory requirements are adhered to
- Assist Exchange House Ireland's Human Resource and Staffing Sub-Committee (HRSC) in managing the organisation's Child Protection requirements to ensure all statutory requirements are adhered to
- Assist the HRSC and Garda Vetting Authorised Signatory to manage and maintain Exchange House Ireland's Garda Vetting requirements to ensure all statutory requirements are adhered to;
- Where necessary deliver/arrange appropriate training and relevant updates for all of the above items to ensure that Exchange House Ireland maintains full compliance with statutory responsibilities;
- Coordinate Exchange House Ireland's complaints management system as Complaint's Officer
- Assist with legislative compliance (statutory) audits as and when required

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1

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