

# **Mayo Public Participation Network**

# Introduction

The purpose of this document is to provide a concise policy statement regarding the Data Protection obligations of Mayo Public Participation Network (PPN). This includes obligations in dealing with personal data, in order to ensure that the organisation complies with the requirements of the relevant Irish legislation, namely the General Data Protection Regulation (GDPR) 2018, the Irish Data Protection Act (1988), and the Irish Data Protection (Amendment) Act (2003).

#### **Policy Statement**

Mayo Public Participation Network is fully committed to protecting the rights and privacy of Individuals and adhering to the General Data Protection Regulation and the Data Protection Act 2018. This Policy applies to all Personal Data collected, processed and stored by Mayo PPN in relation to its staff, service providers and clients in the course of its activities.

#### Purpose

This privacy statement sets out how we process personal data and information that you give to us. We are committed to protecting your personal information. You are not required to provide us with personal data unless you wish to register and receive updates about the work of Mayo PPN.

This privacy statement explains:

- Who we are and why we collect your personal data
- For how long we hold your data and who receives it
- How you may request the personal data we store about you
- Who to contact about data protection issues in our organisation

#### Data we collect

We collect personal data that identifies you as an individual. We do this when you have provided us with information and consented for its use in your interest and for the purposes set out in this privacy statement. The personal information we collect includes your name, postal address, email address and telephone number. In collecting and processing your data we are committed to:

- Putting you in control of your privacy and providing you with clear choices
- Being transparent about how we collect and use your data
- Securely protecting the data, you entrust to us and data processors used by us, using appropriate organisational and technical measures
- Adhering to data protection laws

When you register, telephone or email Mayo PPN, visit our website or fill our contact forms you consent to the use of that information as set out in this statement.

If you wish to withdraw consent to being contacted by us, please do so by sending an email to info@mayoppn.net with 'UNSUBSCRIBE' in the message subject line or click the unsubscribe links contained in our ebulletin emails.

The personal data that you provide us with will only be used for the purpose for which it has been originally obtained or to fulfil legal or regulatory requirements as appropriate.

Individuals have a responsibility to ensure that any emails including attachments that they send us must be within the bounds of the law. Unsolicited content or mail of a criminal nature will be reported to the relevant authorities and blocked.

#### Why we collect data

We collect data to provide club/organisation with information of meetings, events, funding, training opportunities, consultations and relevant news.

#### **Subject Access Requests**

Any formal, written request by a Data Subject for a copy of their personal data (a Subject Access Request) will be referred, as soon as possible, to the Data Protection Sub-committee of the Secretariat, and will be processed as soon as possible.

#### **Third-Party processors**

Data shared with third party

We share your data with third parties only for the purposes set out below:

- <u>Salesforce</u> (Database)
- <u>Blacknight Internet Services</u> (Email)
- Microsoft Office 365 (Email & Forms)
- <u>Survey Monkey</u> (Surveys)

# **The Data Protection Principles**

We will carry out our GDPR responsibilities in accordance with the following six principles. Mayo PPN shall:

# 1. ... be obtained and processed fairly and lawfully.

Mayo PPN ensures that data is gathered and used in a way that is legal, fair and transparent.

# 2. .... be obtained only for one or more specified, legitimate purposes.

Mayo PPN only use data for a legitimate purpose specified at the time of collection.

# 3.... not be further processed in a manner incompatible with the specified purpose(s).

Data collected will only be used for the purpose stated.

4. .... be kept safe and secure.

Appropriate security measures will be taken to protect against unauthorised access to, or alteration, destruction or disclosure of any personal data held by Mayo PPN in its capacity as Data Controller.

# 5. ... be kept accurate, complete and up-to-date where necessary.

Mayo PPN will conduct regular assessments in order to establish the need to keep certain Personal Data.

# 6. ... be adequate, relevant and not excessive in relation to the purpose(s) for which the data were collected and processed.

Mayo PPN will ensure to the best of our abilities to hold accurate, up to date data. If it is no longer accurate, it will be rectified or erased.

# 7. ... not be kept for longer than is necessary to satisfy the specified purpose(s).

Mayo PPN will only store data as long as is necessary.

# 8. ... be managed and stored in such a manner that, in the event a data subject submits a valid subject access request seeking a copy of their personal data, this data can be readily retrieved and provided to them.

Data collected for the Vision for Community Wellbeing for this and further generations is covered by this statement.

# **Data Subject Access Requests**

If you wish to contact us regarding data protection issues or to make a personal data request, you may do so via the following options:

Post your enquiry to: Mayo PPN, Mayo House, Moneen Rd, Castlebar, Mayo

Email your enquiry to: mayoppn@mayococo.ie

Telephone your enquiry to: 094-9064358

# **Dealing with a Data Breach**

In the event of at data breach in information to or from Mayo Public Participation Network the procedure is to immediately notify at least two of the following:

1. Mayo PPN Resource Worker <u>mayoppn@mayococo.ie</u>

- 2. The current convener
- 3. Members of the secretariat Data/IT subcommittee
- 4. The website administrator at mayoppn@mayococo.ie
- 5. The MPPN Data Protection Officer (if that person is not one of the above):

The first person to receive your message will immediately inform all the others

They will assess the breach and proceed following the guidelines set out by The Data Protection Commission

https://dataprotection.ie/docs/GDPR-Overview/m/1718.htm

**Changes to this policy** 

We keep our policy under regular review. This policy was last updated 8<sup>th</sup> February 2022.

# Definitions

# Data

This includes both automated and manual data.

Automated data means data held on computer or stored with the intention that it is processed on computer.

Manual data means data that is processed as part of a relevant filing system, or which is stored with the intention that it forms part of a relevant filing system.

# **Personal Data**

Information which relates to a living individual, who can be identified either directly from that data, or indirectly in conjunction with other data which is likely to come into the legitimate possession of the Data Controller. (If in doubt, Charities Institute Ireland refers to the definition issued by the Article 29 Working Party, and updated from time to time.)

# **Sensitive Personal Data**

A particular category of Personal data, relating to: Racial or Ethnic Origin, Political Opinions, Religious, Ideological or Philosophical beliefs, Trade Union membership, Information relating to mental or physical health, information in relation to one's Sexual Orientation, information in relation to commission of a crime and information relating to conviction for a criminal offence.

# **Data Controller**

A person or entity who, either alone or with others, controls the content and use of Personal Data by determining the purposes and means by which that Personal Data is processed.

# Data Subject

A living individual who is the subject of the Personal Data, i.e. to whom the data relates either directly or indirectly.

# **Data Processor**

A person or entity who processes Personal Data on behalf of a Data Controller on the basis of a formal, written contract, but who is not an employee of the Data Controller, processing such Data in the course of his/her employment.

# **Data Protection Officer**

A person appointed by Charities Institute Ireland to monitor compliance with the appropriate Data Protection legislation, to deal with Subject Access Requests, and to respond to Data Protection queries from staff members and service recipients

# **Relevant Filing System**

Any set of information in relation to living individuals which is not processed by means of equipment operating automatically (computers), and that is structured, either by reference to individuals, or by reference to criteria relating to individuals, in such a manner that specific information relating to an individual is readily retrievable.