

## St. Joseph's Secondary School - Privacy Notice

Reader Information	Title: Privacy Notice
Purpose:	To outline the approved St. Joseph's Secondary School's management approach to be followed in relation to Privacy Notice
Author:	John O'Donovan Principal
Publication date:	10 <sup>th</sup> January 2019
Target Audience:	All staff, service providers, students, parents, guardians and third parties that have access to the St. Joseph's Secondary School information.
Superseded Documents:	All other Privacy Notices.
Review Date:	10 <sup>th</sup> Jan 2020
Contact Details:	St. Joseph's Secondary School at Doon Road, Ballybunion, Co. Kerry. - E-mail <a href="mailto:principal@sjsb.eu">principal@sjsb.eu</a>

### Privacy Notice

St. Joseph's Secondary School are committed to safeguarding the privacy of your personal data. Please read the following Privacy Notice to understand how we collect and use your personal data, for example when you contact us, visit our website, or seek to avail of our services. The Data Controller is St. Joseph's Secondary School, we can be contacted through [principal@sjsb.eu](mailto:principal@sjsb.eu) or through our registered office, which is located at St. Joseph's Secondary School Doon Road, Ballybunion, Co. Kerry. Please note that whenever you provide us with your personal data, you are consenting to its collection, recording, organising, structuring, storing, adaptation, alteration, retrieving, consulting, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### What Personal data do we collect?

St. Joseph's Secondary School may collect personal data such as set out hereunder through interface with our website on [www.sjsb.info](http://www.sjsb.info) or through any e-mail communication, or any other contact that we may have or received from you. A full list of the personal data that we process is listed in the appendix attached to this Privacy Notice. We also collect personal data (images) through our CCTV system in operation in the environs of the school premises. The CCTV Policy published on the website provides further information on the processing of personal data through the CCTV system.

### How we use your personal data

If you provide personal data to us, we will collect that information and use it for the purposes outlined hereunder and in accordance with the terms and references within this Privacy Notice.

### Obligation to provide personal data

You are not obliged to provide your personal data to St. Joseph's Secondary School, you may provide your name, address, contact details or e-mail address (as applicable) as a point of

contact. The purpose of collecting your personal data is outlined in the appendix “A”, “B” “C”, “D” or “E” hereunder in respect of your personal or special category data, to aid the delivery of our educational services etc. Failure to provide personal data will create difficulties in delivering our educational services. The provision of personal or special category data is required mainly in relation to aiding the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills.

### **Explanation as to how the personal data could not possibly be processed by any other means.**

Failure to provide personal or special category data may create difficulties in delivering our educational services. In such event we would have no other means of processing your educational requirements.

### **Sharing your personal data**

When you provide St. Joseph’s Secondary School with your personal data, that data will be used, processed or stored in the school. St. Joseph’s Secondary School shares your personal or special category data with the Principal, Deputy Principal, Teachers, Department of Education & Skills, Student Counsellor, Special Educational Coordinator, Year Heads, Board of Management, Administration Staff, State Examination Commission, National Council for Special Education (NCSE), Tusla, HSE, Department of Social Protection, Revenue Commissioners, Education Welfare Officer, National Education Psychological Service (NEPS), Child and Adolescent Mental Health Service (CAHMS), Counselling Service, VSwire and An Garda Síochána as applicable to each individual case.

St. Joseph’s Secondary School will not share or pass on your personal data to any other persons or third parties, third countries or international organisations other than those specified, unless you specifically request this.

In the event that we receive requests from government departments, agencies or other official bodies, we will only disclose your information, if and to the extent that we believe we are legally required to do so (for example, but without limitation, upon receipt of a court order, warrant, subpoena or equivalent). Except as set out above, we will not disclose your personal data save where we need to do so in order to enforce our rights.

If we are compelled to share your personal data, we take all reasonable steps to ensure that it is treated securely and in accordance with this Privacy Notice.

### **Recipients of categories of Personal Data**

The recipients of the categories of personal and special category data that St. Joseph’s Secondary School processes includes the following Principal, Deputy Principal, Teachers, Department of Education & Skills, Student Counsellor, Special Educational Coordinator, Year Heads, Board of Management, Administration Staff, State Examination Commission,

National Council for Special Education (NCSE), Tusla, HSE, Department of Social Protection, Revenue Commissioners, Education Welfare Officer, National Education Psychological Service (NEPS), Child and Adolescent Mental Health Service (CAHMS), Counselling Service, VSwire and An Garda Síochána as applicable to each individual case.

### **Transfer to third country**

The GDPR and Data Protection Acts require that St. Joseph's Secondary School specify whether or not it transfers personal data to any third country or international organisation. St. Joseph's Secondary School does not transfer any personal data to any third country or international organisation.

### **Period of retention of personal data**

Personal data provided to St. Joseph's Secondary School will be retained for a period of time depending on the purpose of collecting each category of personal data.

1. In the event that personal data is provided in relation to the provision of our educational services we are required to retain the personal data for a period of 7 years after the student reaches the age of 18 years of age.
2. The retention period for documents in relation to provision of education by the school is listed in respect of all school records in the attached Appendix.
3. The retention period for school documents in relation to Revenue records is available at <https://www.revenue.ie/en/vat/vat-records-invoices-and-credit-notes/vat-records-to-be-kept/how-long-do-you-keep-records-for.aspx>
4. CCTV recordings are recorded over after a period of 30 days, unless downloaded in accordance with the principals of the GDPR, bearing in mind the purpose and legal basis for such further processing of personal data.

### **General Description of Technical and organisation measures implemented to protect personal data processed.**

St. Joseph's Secondary School is accessed controlled; it has CCTV System and a security alarm fitted. All personal data records are access controlled, digital data is protected by firewall, antivirus software, username, passwords, encryption functionalities and confidential agreements to ensure personal data is protected during processing.

### **Covid-19 Pandemic**

***Processing Personal Data in relation to Covid-19*** - St. Joseph's Secondary School as well as public, private and voluntary organisations are taking necessary steps to contain the spread and mitigate the effects of Covid-19. Some of the risk mitigations implemented involve the

processing of personal data and special category data of data subjects such as name, address, workplace, travel details, Covid-19 health related information and status, telephone number, position of employment, etc.

**Lawful basis for Processing** - This personal data and special category data is processed in accordance with the terms of 'Article 9(2)(i) of the GDPR, Section 53 of the Data Protection Act 2018, the Safety, Health and Welfare at work Act 2005 (as amended) in relation to the prevention of the spread of Covid-19 virus as the processing of such personal data and special category data is necessary and proportionate in relation to the response to Covid-19 and the information processed is in line with the direction / guidance of the public health authorities.

**Retention Period** - The personal data and special category data processed in relation to Covid-19 pandemic is destroyed after a period of four weeks, unless there are other reasons why it would be required thereafter, i.e. in cases of confirmed cases of Covid-19 -sick benefits / records, Pay purposes, Insurance etc.

**Questionnaires** - The implementation of questionnaires and contract tracing logs for visitors and contractors to the school were considered and implemented in mitigating risks to teachers, staff, students including vulnerable persons within the school along with available information, categories of personal data, and special category data as mentioned in the guidance provided by the Public health authority.

**Sharing of Covid-19 related Persona Data / Special Category Data -**

Personal data / special category data processed in relation to the prevention of Covid-19 virus will be shared with the Board of Management, Principal, Deputy Principal, Teachers, Year Heads Administration Staff, Department of Health, HSE Contracting Tracing Officials, Insurance Company as applicable. The personal data identifying a data subject will not be shared within St. Joseph's Secondary School, the only information that will be shared in the event of a suspected or confirmed case of Covid-19 in the school is that there has been a case or suspected case of Covid-19 in the school etc. along with details of any other mitigating factors that will be implemented. The name of any affected individual will not be disclosed other than to the appropriate authorities and those mentioned above as applicable to each case. All personal and special category data processed in relation to the prevention of the spread of Covid-19 will be treated in confidence.

The categories of personal and special category data processed under the Covid-19 Pandemic is outlined at the bottom of Appendix "E".

**Product and service-related data**

If you avail of our educational services or are employed by St. Joseph's Secondary School, we may collect and process your personal and special categories of data as is outlined at Appendix "A", "B", "C", "D" or "E" as applicable.

In order to continuously provide our educational services, it may be necessary for us to

collect and process certain information relating to you. You acknowledge and agree that the information we collect may include personal and or special category data as is outlined in the Appendix "A", "B", "C", "D" or "E" as is applicable to you.

We are committed to safeguarding the privacy of your personal and special category data and we will never share this outside of those mentioned above.

## **Notice of Data Subject Rights**

### **Right of Access**

The data subject has the rights to obtain from St. Joseph's Secondary School (Controller) confirmation as to whether or not personal data concerning him or her is being processed and where such personal data is being processed, he / she will have the right to access their personal data and ascertain the purpose of any processing, the categories of personal data concerned, the recipients or categories of recipient to whom the personal data has been or will be disclosed, in particular any recipients in third countries or international organisations, the period for which the personal data will be retained or stored or if not possible the criteria used to determine that period, the right to request from the controller rectification or erasure of their personal data or restriction of processing of personal data concerning the data subject or their right to object to such processing, the right to lodge a complaint to the supervisory authority (Data Protection Commissioner), in the event that the personal data was not collected from the data subject any available information as to their source and the existence of any automated decision-making profiling and at least in such events meaningful information about the logic involved as well as the significance and the envisaged consequences of such processing for the data subject. In the event of personal data being transferred to a third country or to an international organisation the data subject has the right to be informed of the appropriate safeguards relating to the transfer. The data subject also has the right to obtain a copy of the personal data undergoing processing from the controller. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. The right to obtain a copy or further copies of personal data being processed shall not adversely affect the rights and freedoms of others. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs.

### **Right to Rectification**

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### **Right to erasure ('right to be forgotten')**

The data subject has the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall be obliged to erase their personal data without undue delay where one of the following grounds applies:

- (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) the data subject withdraws consent to the processing of his or her personal data for one or more specific purposes, or where the European Union or Member State law prohibit the consenting by data subjects to the processing of special categories of personal data and where there is no other legal ground for the processing;
- (c) the data subject objects to the processing on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her based on the grounds that processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller or processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child (except where processing is carried out by public authorities in the performance of their tasks) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing of their personal data for direct marketing purposes including profiling for direct marketing purposes .
- (d) the personal data has been unlawfully processed;
- (e) the personal data has to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- (f) the personal data has been collected in relation to the offer of information society services from a child under the age of 16 years of age and the consent for the processing of that child's personal information has not been given or authorised by the holder of parental responsibility over the child .

*The above requirements in relation to the right to erasure shall not apply to the extent that processing is necessary:*

- (a) for exercising the right of freedom of expression and information;
- (b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- (c) when processing personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic

data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation is for reasons of public interest in the area of public health or where such data is processed by or under the responsibility of a professional subject to the obligation of professional secrecy under Union or Member State law or rules established by national competent bodies or by another person also subject to an obligation of secrecy under Union or Member State law or rules established by national competent bodies.

- (d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subjected to the appropriate safeguards being put in place in accordance with this regulation, protecting the rights and freedoms of the data subject by the putting in place technical and organisational measures to ensure respect for the principle of data minimisation, which may include pseudonymisation; provided such purposes can be fulfilled in that manner or where further purposes for processing of such data does not permit or no longer permits the identification of data subjects, then those purposes shall be fulfilled in that manner so as to render impossible or seriously impair the achievements of the objectives of that processing or
- (e) for the establishment, exercise or defence of legal claims.

### **Right to restriction of processing**

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- (a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- (b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- (c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- (d) the data subject has objected to processing on grounds relating to his or her particular situation, to processing of personal data concerning him or her which is based on the fact that processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller or where processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child, with the exception of processing carried out by public authorities in the performance of their tasks; pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted under the above conditions, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

A data subject who has obtained restriction of processing pursuant to the above-mentioned conditions shall be informed by the controller before the restriction of processing is lifted. Right to notification obligation regarding rectification or erasure of personal data or restriction of processing. The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with their right to rectification, erasure, and restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.

#### **Right to data portability**

1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes or the data subject has given explicit consent to the processing of personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition the processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation may not be lifted by the data subject; if the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to above may not be lifted by the data subject or on a contract where the 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 ; and

(b) the processing is carried out by automated means.

2. In exercising his or her right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

3. The exercise of the right to data portability shall be without prejudice to the data subject's right to erasure Article 17. which shall not apply to processing necessary for the



performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

4. provided that the right of data portability of a data subject shall not adversely affect the rights and freedoms of others.

### **Right to object**

1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; or where processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child or (processing carried out by public authorities in the performance of their tasks) including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

4. This right to object should be brought to the notice of the data subject at the very first communication and shall be presented clearly and separately from any other information.

5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.

6. Where personal data are processed for scientific or historical research purposes or statistical purposes Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

### **Right to withdraw consent**

Where the processing is based on the data subject having given consent to the processing of his or her personal data for one or more specific purposes except where Union or Member State law provide that the prohibition the right to withdraw his or her consent may not be lifted by the data subject; or where consent to processing of his or her personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation the data subject has the right to withdraw the consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;

**Time frame to respond to requests**

If you exercise any of your rights under the General Data Protection Regulations such as access to and rectification or erasure of personal data or the exercise of the right to object, St. Joseph's Secondary School (the Controller) is obliged to respond to requests without undue delay and at the latest within **one month** and if St. Joseph's Secondary School failed to comply with your requests, St. Joseph's Secondary School must give you reasons why.

Mechanisms for the right to request from the controller, access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability are available through St. Joseph's Secondary School.

**How a Data Subjects may verify the accuracy or request to amend their personal data?**

A data subject may verify that their personal data submitted to St. Joseph's Secondary School is accurate by double checking their data that they entered before submitting the details to St. Joseph's Secondary School. In the event of any inaccuracy being discovered in any e-mails or other communications the data subject may send an e-mail to St. Joseph's Secondary School at [principal@sjsb.eu](mailto:principal@sjsb.eu) informing us of the inaccuracy and the relevant corrections required. St. Joseph's Secondary School will rectify any inaccurate data highlighted.

**How to exercise your data subject rights?**

Similarly, if a data subject wishes to request their personal data to be deleted, or wishes to request the portability of their personal data or to access their personal data, withdraw their consent to the processing of same, the data subject may e-mail St. Joseph's Secondary School at [principal@sjsb.eu](mailto:principal@sjsb.eu) and request it. However, the data subject should note that the personal data that is processed under 'legal obligation' cannot be deleted until the required period of retention has expired, which is seven (7) years after the student reaches the age of 18 years of age. Regarding the consent withdraw, if the data subject consented to more than one form of processing, the data subject should clarify if the withdrawal is in respect of all processing of their personal data or in respect of one or more purposes of processing their personal data.

The controller is obliged to respond to a data subject request without undue delay and in any event within ***one month*** and where the controller does not comply with the request the controller is required to give reasons for such non-compliance.

## **Right of Data Subject to lodge a complaint with the Supervisory Authority**

The data subject has the right to lodge a complaint with the supervisory if he or she feel that any of their rights under the General Data Protection Regulations have been infringed and the data subject also has a right to seek judicial remedy to any such infringement.

## **The Data Commissioner in Ireland may be contacted by**

<b>Telephone</b>	<b>+353 57 8684800 +353 (0)761 104 800</b>
<b>Fax</b>	<b>+353 57 868 4757</b>
<b>E-mail</b>	<a href="mailto:info@dataprotection.ie">info@dataprotection.ie</a>
<b>Postal Address</b>	<b>Data Protection Commission Canal House Station Road Portarlinton R32 AP23 Co. Laois. Dublin Office 21 Fitzwilliam Square Dublin 2 D02 RD28 Ireland.</b>

## **Right to an effective judicial remedy against a controller or processor**

Each data subject shall have the right to an effective judicial remedy where he or she considers that his or her rights under this Regulation have been infringed as a result of the processing of his or her personal data in non-compliance with the GDPR.

## **Right to Representation of data subjects**

Each data subject shall have the right to mandate a not-for profit body, organisation or association properly constituted in accordance with the law and that is active in the field of the protection of data subject's rights and freedoms with regard to the protection of their personal data to lodge the complaint on his or her behalf.

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Each data subject shall have the right to mandate a not-for profit body, organisation or association properly constituted in accordance with the law and that is active in the field of the protection of data subject's rights and freedoms with regard to the protection of their personal data to lodge the complaint on his or her behalf.

## **Right to compensation**

Any person who has suffered material or non-material damage as a result of an infringement of the GDPR shall have the right to receive compensation from the controller or processor for the damage suffered.

## **Security of Personal Data**

St. Joseph's Secondary School endeavour to hold all personal data securely in accordance with our internal security procedures and applicable laws. St. Joseph's Secondary School will encrypt all personal data received as applicable to ensure the protection of personal data and to prevent any unauthorised access to your personal data or the unauthorised use of your personal data.

Unfortunately, no data transmission over the Internet or any other network can be guaranteed as 100% secure. As a result, while we strive to protect your personal data, we cannot ensure and do not warrant the security of any information you transmit to us, and this information is transmitted at your own risk.

### **Risks & Safeguard**

The greatest risk to personal data is that of it unlawful access. St. Joseph's Secondary School has addressed and mitigated such potential risk by regulation of access, provision of access controls to safeguard and encryption personal data it processes through VSware, PPOD, E-mail attachment encryption application and ProtectorApp Encryption Program as applicable.

### **Rules in relation to the processing of personal data**

The rules of processing of personal data that is processed by St. Joseph's Secondary School is that all personal data will be stored in encrypted format through VSware, PPOD, E-mail attachment encryption application and ProtectorApp Encryption Program as applicable.

### **Contact Details of St. Joseph's Secondary School**

St. Joseph's Secondary School  
Telephone number 068 27205  
Doon Road, Ballybunion, Co. Kerry  
Email address; [principal@sjsb.eu](mailto:principal@sjsb.eu)  
Website: [www.sjsb.info](http://www.sjsb.info)

If you wish to request any information about your personal data or believe that we are holding incorrect personal data on you, please contact [principal@sjsb.eu](mailto:principal@sjsb.eu).

### **Provision of the contents of Privacy Notice Orally**

If a data subject wishes to receive the information contained in this privacy notice orally, this will be provided by sending an e-mail to [principal@sjsb.eu](mailto:principal@sjsb.eu) requesting same and providing a contact phone number and a suitable time for the delivery of the information contained within this document to the intended recipient. Arrangements will be made for a member of St. Joseph's Secondary School to phone the intended recipient and provide all the contents of St. Joseph's Secondary School Privacy Notice to him or her and we will also ascertain if the recipient understands the information that has been provided orally to him or her.

### **Cookies**

St. Joseph's Secondary School uses Cookies<sup>1</sup> which are strictly necessary.

## Managing cookies in your browser

Use the tools and options in your web browser if you do not wish to receive a cookie. You can easily delete and manage any cookies that have been installed in the cookie folder of your browser by following the instructions provided by your particular browser manufacturer.

Consult the documentation that your particular browser manufacturer provides. You may also consult your mobile device documentation for information on how to disable cookies on your mobile device.

To learn more about cookies you can visit <http://www.allaboutcookies.org/> which has a comprehensive guide on them and on how to restrict / delete them for most common browsers.

## Third party Websites and Links

Please note that you may have cookies placed on your computer by third parties' websites that refer you to our website. Please review their privacy policies of each website you visit to better understand their privacy practices. We would like to inform you that anytime you click on links (including advertising banners), which take you to third party websites, you will be subject to the third parties' privacy policies.

While our website may contain links to other sites operated by third parties, we do not control such other sites and are not responsible for their content, their privacy policies or their use of personal data including any personal or financial information collected by third party's payment processors to process payments in relation our school. Our inclusion of such links does not imply any endorsement of the content of such sites or of their owners or operators except as stated on our website. Any information submitted by you directly to these third parties is subject to that third party's privacy policy.

## Automated Decision Making (Profiling)

St. Joseph's Secondary School does not use any automated decision-making tools or processes in its processing of any personal data.

Under the GDPR you have the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affecting you, however, this shall not apply if a decision is necessary for entering into or performance of a contract between you and the data controller, or is authorised by European Union or Member State law or where you have given explicit

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<sup>1</sup> A cookie is a piece of text that gets entered into the memory of your browser by a website, allowing the website to store information on your machine and later retrieve it. Cookies can also enable the tracking and targeting of the interests of users to enhance the onsite experience.

consent for such processing.

If your personal data was subjected to automated decision-making, including profiling you are entitled to be notified of the existence of such processing and information about the logic involved as well as any significance and the envisaged consequences of such processing for you as well as the right to obtain human intervention on the part of the controller in such processing, the right to express your point of view and the right to contest the decision.

Where decisions are based solely on automated processing, including profiling, the controller will ensure that they are not to be based on special categories of personal data unless they are processed under a contract, member state law, explicit consent or in the public interests and that suitable measures are in place to safeguard the data subject's rights and freedoms and legitimate interests.

### **Account management**

St. Joseph's Secondary School may use your contact details

- i. providing account management,
- ii. maintaining our school's accounts and records.

### **Market research and surveys**

St. Joseph's Secondary School does not engage in market research or surveys

### **Email communications**

St. Joseph's Secondary School adhere to the following guidelines in relation to our email communications:

- emails will clearly identify us as the sender,
- you may unsubscribe from all mailing lists, with the exception of any emails regarding legal notices, invoicing,
- any third parties who send emails on our behalf will be required to comply with legislative requirements on unsolicited emails and the use of personal data.
- We send emails from a number of different domains in both plain text and HTML email formats. Emails are usually sent using sender email addresses at: [saintjoesbb@gmail.com](mailto:saintjoesbb@gmail.com) or [principal@sjsb.eu](mailto:principal@sjsb.eu)

If you receive an email which claims to come from us but does not, use this domain, or if you are suspicious that an email may not be approved by us, then please send a copy of the email to [principal@sjsb.eu](mailto:principal@sjsb.eu) so we can investigate.

### **Email communications**

St. Joseph's Secondary School adhere to the following guidelines in relation to our email communications:

- emails will clearly identify us as the sender,
- emails sent for marketing purposes (if you consented to receiving same) will include an option to unsubscribe from future email messages,
- you may unsubscribe from all mailing lists, with the exception of any emails regarding legal notices, invoicing etc.
- any third parties who send emails on our behalf will be required to comply with legislative requirements on unsolicited emails and the use of personal data.
- We send emails from: [principal@sjsb.eu](mailto:principal@sjsb.eu)

If you receive an email which claims to come from us but does not, use this domain, or if you are suspicious that an email may not be approved by us, then please send a copy of the email to [principal@sjsb.eu](mailto:principal@sjsb.eu) so we can investigate.

### Links

This Privacy Notice applies to personal data collected by St. Joseph's Secondary School. If an email or website contains links to a third-party site, please be aware that we are not responsible for the content or privacy practices of such site. We encourage our users to be aware when they leave our Site, and to read the Privacy Notice of other sites that collect personal data.

### Notification of changes

This Privacy Notice was last updated on 10<sup>th</sup> January 2019. We reserve the right to amend or vary this Notice at any time and the revised Notice will apply from the date posted on the site. St. Joseph's Secondary School will provide a link to our Privacy Notice on electronic correspondences in order to keep you abreast of the contents of this Notice.

### Reviews of St. Joseph's Secondary School compliance with the GDPR

Reviews of St. Joseph's Secondary School compliance with the General Data Protection Regulations and Data Protection Acts will be conducted every year.

**Appendix “A”****Student’s Personal and Special Category Data Purpose of Processing**

Category	Personal (P) / Special (S)	Purpose of Processing of Data	Duration of Retention of Data	Lawful Basis of Processing Personal Data
Student's PPS Number	P	Identification in relation to the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills, Revenue & Department of Social Protection	Retained until student is 25 years of age.	'Legal Obligation'
Student's Birth Certificate	P	Identification and proof of age	Retained until student is 25 years of age.	'Legal Obligation'
Student's Forename	P	Identification in relation to the performance of the functions conferred under enactment of secondary legislation by the	Retained until student is 25 years of age.	'Legal Obligation' & 'Consent' in relation to Garda Vetting and this



		Department of Education & Skills		special category of data.
<b>Student's Middle Name</b>	<b>P</b>	Identification of Applicant for Garda Vetting	Retained until student is 25 years of age.	'Consent'
<b>Student's Surname</b>	<b>P</b>	Identification in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education & Skills	Retained until student is 25 years of age.	'Legal Obligation' & 'Consent' in relation to Garda Vetting
<b>Student's Address</b>	<b>P</b>	Identification, communication and completion of administration records in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education	Retained until student is 25 years of age.	'Legal Obligation' & 'Consent' in relation to Garda Vetting
<b>Student's Eircode</b>	<b>P</b>	Identification, and for the performance of the functions conferred under enactment of secondary legalisation by the Department of Education & Skills	Retained until student is 25 years of age.	'Legal Obligation' & 'Consent' in relation to Garda Vetting
<b>Student's Date of Birth</b>	<b>P</b>	Identification, and for the performance of the functions conferred under enactment of secondary legalisation by the Department of Education & Skills	Retained until student is 25 years of age.	'Legal Obligation' & 'Consent' in relation to Garda Vetting
<b>Student's Nationality –</b>	<b>S</b>	Processed for the performance of the functions conferred under enactment of secondary legalisation by the Department of Education & Skills	Retained until student is 25 years of age.	'Legal Obligation'
<b>Student's Gender</b>	<b>P</b>	Processed for the performance of the functions conferred under enactment of secondary legalisation by the Department of Education & Skills	Retained until student is 25 years of age.	'Legal Obligation'
<b>Student's Mother's tongue - English or Irish?</b>	<b>P</b>	Processed to aid the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills	Retained until student is 25 years of age.	'Legal Obligation'

<b>Student's Unique I.D. Number (generated by PPOD)</b>	<b>P</b>	Processed for the purpose of identification of Student	Retained until student is 25 years of age.	'Legal Obligation'
<b>Student's Records of Significant Achievements</b>	<b>P</b>	Processed to aid the performance of the functions conferred under enactment of secondary legalisation by the Department of Education & Skills	Retained until student is 25 years of age.	'Legal Obligation'
<b>Student's Attendance Data - attendance, absences and reasons for absences records</b>	<b>P</b>	Processed to aid the performance of the functions conferred under enactment of secondary legalisation by the Department of Education & Skills & the Education (Welfare) Act 2000	Retained until student is 25 years of age.	'Legal Obligation'
<b>Safeguarding Information in relation to Student</b>	<b>S</b>	Processed for the purpose of the safety and welfare of the student	Retained until student is 25 years of age.	'Legal Obligation'
<b>Student's Home Telephone number</b>	<b>P</b>	Processed for the purpose of communication	Retained until student is 25 years of age.	'Consent'
<b>Student's School e-mail address</b>	<b>P</b>	Processed for the purpose of communication	Retained until student is 25 years of age.	'Legitimate Interests'
<b>Student's Current Primary School</b>	<b>P</b>	Processed to aid the performance of the functions conferred under enactment of secondary legalisation by the Department of Education & Skills	Retained until student is 25 years of age.	'Legal Obligation'
<b>Student's Previous Schools attended</b>	<b>P</b>	Processed to aid the performance of the functions conferred under enactment of secondary legalisation by the Department of Education & Skills	Retained until student is 25 years of age.	'Legal Obligation'
<b>Student's Behavioural Information including any exclusion information where relevant.</b>	<b>P</b>	Processed to aid in the safety and welfare of the student and in the performance of the functions conferred under enactment of secondary legalisation by the Department of Education & Skills	Retained until student is 25 years of age.	'Legal Obligation'
<b>Mother's Name</b>	<b>P</b>	Processed to aid the performance of the functions conferred under enactment of secondary legalisation by the Department of Education & Skills	Retained until student is 25 years of age.	'Legal Obligation'

<b>Mother's Address</b>	<b>P</b>	Processed for the purpose of communication and the performance of the functions conferred under enactment of secondary legalisation by the Department of Education & Skills	Retained until student is 25 years of age.	'Consent'
<b>Mother's Maiden Name</b>	<b>P</b>	Processed in the performance of the functions conferred under enactment of secondary legalisation by the Department of Education & Skills	Retained until student is 25 years of age.	'Legal Obligation'
<b>Mother's Contact Number</b>	<b>P</b>	Processed for purpose of communication and point of contact in emergency situations	Retained until student is 25 years of age.	'Consent'
<b>Mother's email</b>	<b>P</b>	Processed for purpose of communication	Retained until student is 25 years of age.	'Consent'
<b>Mother's Tel No. at Work</b>	<b>P</b>	Processed for purpose of communication	Retained until student is 25 years of age.	'Consent'
<b>Father's Name</b>	<b>P</b>	Processed to aid the performance of the functions conferred under enactment of secondary legalisation by the Department of Education & Skills	Retained until student is 25 years of age.	'Consent'
<b>Father's address</b>	<b>P</b>	Processed for the purpose of communication and the performance of the functions conferred under enactment of secondary legalisation by the Department of Education & Skills	Retained until student is 25 years of age.	'Consent'
<b>Father's mobile number</b>	<b>P</b>	Processed for purpose of communication and point of contact in emergency situations	Retained until student is 25 years of age.	'Consent'
<b>Father's e-mail</b>	<b>P</b>	Processed for purpose of communication	Retained until student is 25 years of age.	'Consent'
<b>Position of child in Family</b>	<b>P</b>	To assess and strategically plan for the educational needs and requirements of the family.	Retained until student is 25 years of age.	'Consent'
<b>Name of 'Emergency Contact' (other than Parent)</b>	<b>P</b>	Processed as a point of contact in cases of emergency where parent /guardian is not contactable	Retained until student is 25 years of age.	To assess and strategically plan for the educational needs and

				requirements of the family.
Telephone number of 'Emergency Contact' (other than Parents)	P	Processed as a point of contact in cases of emergency where parent /guardian is not contactable	Retained until student is 25 years of age.	'Consent'
Address of 'Other' Emergency Contact Person	P	Purpose of verification of identification of the 'other emergency contact person' should he /she make contact with the school or exercise their 'Data Subject's Rights'	Retained until student is 25 years of age.	'Consent'
Emergency Contact Person's Relationship to student	P	Student's Health & Welfare - Relationship to student may arise in relation to consent in emergency situation where contact cannot be established with parents / guardian.	Retained until student is 25 years of age.	'Consent'
Details of any orders or custody arrangements in place governing access to or custody of the child (provide details)	P	Provision of student's safety and welfare	Retained until student is 25 years of age.	'Consent'
Name of any brother / sister(s) in the school	S	To assess the parent's knowledge of the school's educational system and establish the level of information or assistance they may require with the introduction of their child in to the school. The category of data is also required in relation to the prioritising of admissions as priority is given to applications strictly in order of preference listed below: a) Siblings of present students; b) Students from the feeder Primary Schools c) All other applicants.	Retained until student is 25 years of age.	'Legal Obligation'
Health and Medical History indicate any medical issue that School needs to be aware of - health checks, physical and mental health care and allergies.	P	Processed in relation to the safety, health and welfare of the student and to ensure that the educational needs of all students, including those with a disability or other special educational needs, are identified and provided for	Retained until student is 25 years of age.	'Consent'
Doctor's Name usually attended	S	Contact, Communication and sharing of details with	Retained until student is 25 years of age.	'Legal Obligation'

		other emergency services in case of a medical emergency		
<b>Doctor's Number</b>	<b>P</b>	Contact, Communication and sharing of details with other emergency services in case of a medical emergency	Retained until student is 25 years of age.	'Vital Interests'
<b>Other Relevant Health Information</b>	<b>P</b>	Contact, Communication and sharing of details with other emergency services in case of a medical emergency	Retained until student is 25 years of age.	'Vital Interests'
<b>Exemption from Irish</b>	<b>S</b>	This information is processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills, and to establish the educational needs of students with a disability or other special educational need	Retained until student is 25 years of age.	'Consent'
<b>If child possesses an exemption, please indicate reason for the exemptions</b>	<b>S</b>	This information is processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills, and to establish the educational needs of students with a disability or other special educational need	Retained until student is 25 years of age.	'Legal Obligation' in relating to requirement to establish educational needs, however 'Consent' is sought as a result of the advice from the Data Commissioner to the Department of Justice in relation to the 'October Returns'
<b>Did the student receive learning support / resource in Primary school?</b>	<b>S</b>	This information is processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills, and to establish the educational needs of students with a disability or other special educational need	Retained until student is 25 years of age.	'Legal Obligation' in relating to requirement to establish educational needs, however 'Consent' is sought as a result of the advice from the Data Commissioner

				r to the Department of Justice in relation to the 'October Returns'
<b>If the student did receive learning support / resource in Primary School in what subjects was the support given?</b>	<b>S</b>	This information is processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills, and to establish the educational needs of students with a disability or other special educational need	Retained until student is 25 years of age.	'Consent'
<b>Has Student any Educational Psychological Assessment? (if yes, please provide a copy of that report with the application form)</b>	<b>S</b>	This information is processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills, and to establish the educational needs of students with a disability or other special educational need	Retained until student is 25 years of age.	'Consent'
<b>Class Year</b>	<b>P</b>	This information is processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills	Retained until student is 25 years of age.	'Consent'
<b>Medical Card No. (Parent / Guardian / Student)</b>	<b>P</b>	This information is processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills. The Department requires such data in relation to medical card eligibility for statistical and policy purposes and such data may inform indicators for the classification of DEIS schools.	Retained until student is 25 years of age.	'Legal Obligation'
<b>Is your child a member of the Travelling Community? - Not obligatory</b>	<b>S</b>	This information is processed for the performance of the functions conferred under enactment of secondary legislation by the	Retained until student is 25 years of age.	'Consent'

		Department of Education and Skills. The Department requires such data in relation to allocation of appropriate resources to schools to meet the individual needs of the children		
<b>Ethnic or Cultural Background of Student</b>	<b>S</b>	This information is processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills.	Retained until student is 25 years of age.	'Consent'
<b>Record of Academic Progress of Student</b>	<b>S</b>	This information is processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills. The school is required to establish and maintain systems whereby the efficiency and effectiveness of its operations can be assessed, including the quality and effectiveness of teaching in the school and the attainment levels and academic standards of students under the Department of Education Act 1998.	Retained until student is 25 years of age.	'Consent'
<b>Previous academic record (including reports, references, assessments and other records from any previous school(s) attended by the student)</b>	<b>P</b>	This information is processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills. The school is required to establish and maintain systems whereby the efficiency and effectiveness of its operations can be assessed, including the quality and effectiveness of teaching in the school and the attainment levels and academic standards of students under the Department of Education Act 1998.	Retained until student is 25 years of age.	'Legal Obligation'

<b>Name &amp; Address of Student repeating the Leaving Certificate</b>	<b>P</b>	This information is processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills. The school is required to establish and maintain systems whereby the efficiency and effectiveness of its operations can be assessed, including the quality and effectiveness of teaching in the school and the attainment levels and academic standards of students under the Department of Education Act 1998.	Retained until student is 25 years of age.	'Legal Obligation'
<b>External Candidates' signature when sitting examinations</b>	<b>P</b>	This information is processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills.	Retained until student is 25 years of age.	'Legal Obligation'
<b>Examination Candidates' Number</b>	<b>P</b>	This information is processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills, such as identification of the student answer book, envelope, map, drawing or sheet of squared paper used etc.	Retained until student is 25 years of age.	'Legal Obligation'
<b>Photograph</b>	<b>P</b>	Purpose of identifying the student. For internal safeguarding and security purposes, including school displays such as inclusion in the school's digital bank of photographs, recorded video images of school events, printed year group photographs / pamphlets / brochures, / yearbooks, for the publishing of photographs / images / videos on the school website, school social media accounts, in newspapers, and other similar school related publications.	Retained until student is 25 years of age.	'Legal Obligation'



<b>Student's Academic Year &amp; Subjects</b>	<b>S</b>	This information is processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills.	Retained until student is 25 years of age.	'Legitimate Interests' in relation to identification and 'Consent' in relation to other purposes
<b>CCTV Recording</b>	<b>P</b>	CCTV systems are installed (both internally and externally) in the school for the purpose of enhancing security of the school, its environment and its associated equipment as well as for the purpose of creating a mindfulness among the occupants, that at any one time a surveillance security system is in operation within and/or in the external environs of the premises during both the daylight and night hours each day.	Retained for 30 days.	'Legal Obligation'
<b>Garda Vetting Outcome Record (where the student is engaged in work experience organised with or through the school/ETB which requires that they be Garda vetted)</b>	<b>S</b>	This information is processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills, Children's Safety and prospective employment,	Retained until student is 25 years of age.	Legitimate Interest'

## Appendix "B"

### Employee's Personal and Special Category Data Purpose of Processing

<b>Category</b>	<b>Personal (P) / Special (S)</b>	<b>Purpose of Processing of Data</b>	<b>Duration of Retention of Data</b>	<b>Lawful Basis of Processing Personal Data</b>
<b>Employee's Forename &amp; Surname</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills and Revenue regulations	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for	Legal

		concerning Pay, Pensions etc. and the management and administration of school business,	proceedings to be served on the school)	
<b>Employee's Address</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Employee's PPS Number</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Employee's Phone Number</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Consent'
<b>Employee's e-mail address</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Consent'
<b>Employee's Qualifications</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Employee's Education Qualifications</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Employee's Contract Type</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'

<b>Details of Employee's Posts Holder</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Employee's Previous School</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Teacher's Council Registration Number</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>List of Employee's Sectors Registered with Teaching Council</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>List of employee's subjects registered with the Teaching Council</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Employee's Number of Hours Teaching</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Health Records</b>	<b>S</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Employee's References</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the	Retain for duration of employment plus 7 years (6 years in which to take a claim against the	'Legal Obligation'

		Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	school, plus 1 year for proceedings to be served on the school)	
<b>Employee's Probation Letters / Forms</b>	<b>S</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Employee's details of leave, job sharing, career break, maternity leave, Parental leave</b>		Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Employee's details of Paternity Leave</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for 2 years following retirement/resignation or the duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) (whichever is the greater).	'Legal Obligation'
<b>Employee's details of Force Majeure leave, Carers Leave,</b>	<b>S</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Must be kept for 8 years - Parental Leave Act 1998. Retain for 8 years or the duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) (whichever is the greater). There is a statutory requirement to retain for 8 years.	'Legal Obligation'
<b>Employee's Record of Sickness Absence Records / Certificates</b>	<b>S</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Re sick leave scheme (1 in 4 rule) ref DES C/L 0060/2010 Retain for 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), unless sickness absence relates to an accident/ injury/	'Legal Obligation'

			incident sustained in relation to or in connection with the individual's duties within the school, in which case, do not destroy.	
<b>Employee's records of Working Time Act (attendance hours, holidays, breaks)</b>		Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school). There is a statutory requirement to retain for 3 years	'Legal Obligation'
<b>Particulars of allegations and Complaints, Grievance and Disciplinary records, Working Time Act (attendance hours, holidays, breaks)</b>	<b>S</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills	Retain for duration of employment plus 7 years (6 years to take a claim, plus 1 year for proceedings to be served).	'Legal Obligation'
<b>Employee's Pre-employment medical assessment, Occupational Health Referral, Correspondence Retirement on ill health grounds, Medical assessments or referrals Sick leave records (Sick Benefit Forms)</b>	<b>S</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), unless sickness absence relates to an accident/ injury/ incident sustained in relation to or in connection with the individual's duties within the school, in which case, do not destroy.	'Legal Obligation'
<b>Employee's records of Medical assessments or referrals</b>	<b>S</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills	Retain for 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school), unless Medmark assessment relates to an accident/ injury/ incident sustained in relation to or in connection with the individual's duties within the school, in which case, do not destroy.	'Legal Obligation'

<b>Employee's Pension calculation, Pensions Increases, Salary Claim forms</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Duration of employment + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) or for the life of employee/former employee plus + 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school) (whichever is the longer)	'Legal Obligation'
<b>Returns identifying individual staff</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	If it relates to pay/pension/benefits of staff, keep indefinitely - If it relates to information on students, e.g. October Returns, Annual Census etc., to be retained until student reaches 18 years + 7 years.	'Legal Obligation'
<b>CCTV Recording</b>	<b>S</b>	CCTV systems are installed (both internally and externally) in the school for the purpose of enhancing security of the school, its environment and its associated equipment as well as for the purpose of creating a mindfulness among the occupants, that at any one time a surveillance security system is in operation within and/or in the external environs of the premises during both the daylight and night hours each day.	CCTV recordings / images will not be retained for longer than 30 days, unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the Chairperson of the Board of Management	Legitimate Interest'
<b>Financial records - payroll, taxation,</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Revenue Commissioners require that records be kept for at least six years after the end of the tax year.	'Legal Obligation'
<b>Invoices/back-up records/ receipts</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for 7 years	'Legal Obligation'

<b>Records of Posts of Responsibility</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain indefinitely on master file as it relates to pay/pension etc.	'Legal Obligation'
<b>Records of Calculation of Service, Promotions / POR Board Assessment Report Files</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain indefinitely on master file	'Legal Obligation'
<b>Records of Promotions/ Board Assessment Report Files</b>	<b>S</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Post of Retention Documents</b>	<b>P</b>	Processed in relation to the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills and Revenue regulations concerning Pay, Pensions etc.	Retain original on personnel file and copy of master & appeal file. Retain for duration of employment + 7 years (6 years in which to take a claim, plus 1 year to serve proceedings on school). Copy on master and appeal file.	'Legal Obligation'
<b>Name of staff member who checked Birth Certificate of Student in relation to the inputting of the personal data into PPOD</b>	<b>P</b>	Processed for the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Criminal Convictions</b>	<b>S</b>	Processed in relation to legal requirements for Garda Vetting, Child protection, safety and welfare. As well as for the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Records of any reports the school (or its employees) have made in respect</b>	<b>S</b>	Processed for the performance of the functions conferred under enactment of secondary legalisation by the Department	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for	'Legal Obligation'

of the staff member to State departments and/or other agencies (under mandatory reporting legislation and/or child safeguarding guidelines (subject to the DES Child Protection Procedures).		of Education and Skills and Child Protection	proceedings to be served on the school)	
Former Employee's Forename & Surname	P	Processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
Former Employee's Address	P	Processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
Former Employee's PPS Number	P	Processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
Former Employee's Phone Number	P	Processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
Former Employee's e-mail address	P	Processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
Records of any serious injuries/ accidents etc	S	Processed for the performance of the functions conferred under enactment of secondary legislation by the Department	Retain for duration of employment plus 7 years (6 years in which to take a claim against the	'Legal Obligation'



		of Education and Skills. And Insurance purposes	school, plus 1 year for proceedings to be served on the school)	
Records of any reports the school (or its employees) have made in respect of the student to State departments and/or other agencies under mandatory reporting legislation and/or child safeguarding guidelines (subject to the DES Child Protection Procedures).		Processed for the purpose of the safety and welfare of the student.	Record to be retained until student reaches 18 years + 7 years.	Legal Obligation

## Appendix “C”

### Personal Data of Board of Management, Trustees, Patrons and Parents Association.

Category	Personal (P) / Special (S)	Purpose of Processing of Data	Duration of Retention of Data	Lawful Basis of Processing Personal Data
Name & Address of Board of Management	P	Processed for the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills.	Indefinitely.	'Legal Obligation'
Contact Details of Members of the Board of Management	P	Processed for the performance of the functions conferred under enactment of secondary	Indefinitely.	'Legal Obligation'

		legalisation by the Department of Education and Skills.		
<b>Name, Address &amp; contact Details of Former Members of the Board of Management</b>	<b>P</b>	Processed for the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills.	Indefinitely.	'Legal Obligation'
<b>Trustee's Name &amp; Address</b>	<b>P</b>	Processed for the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills, Administration, Financial Records and Revenue	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Trustee's Contact Details</b>	<b>P</b>	Processed for the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills, Administration, Financial Records and Revenue	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Patron's Name &amp; Address</b>	<b>P</b>	Processed for the performance of the functions conferred under enactment of secondary legalisation by the Department of Education and Skills, Administration, Financial Records and Revenue	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'

Patron's Contact Details	P	Processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills, Administration, Financial Records and Revenue	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
Parent's Association Contact Name	P	Processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
Parent's Association Phone Number	P	Processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Consent'
Parents Association email	P	Processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Consent'

## Appendix “D”

### Personal Data of Donors and Creditors.

Category	Personal (P) / Special (S)			
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		<b>Purpose of Processing of Data</b>	<b>Duration of Retention of Data</b>	<b>Lawful Basis of Processing Personal Data</b>
<b>Charitable Donor's Name &amp; Address</b>	<b>P</b>	For the purpose of the school entitlement to avail of the scheme of tax relief for donations of money they receive. To claim the relief, the donor must complete a certificate (CHY form) and forward it to the school to allow it to claim the grossed-up amount of tax associated with the donation, and for the keeping of Financial Accounts and Revenue records.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Charitable Donor's Contact Details</b>	<b>P</b>	For the purpose of the school entitlement to avail of the scheme of tax relief for donations of money they receive. To claim the relief, the donor must complete a certificate (CHY form) and forward it to the school to allow it to claim the grossed-up amount of tax associated with the donation, and for the keeping of Financial Accounts and Revenue records.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Charitable Donor's PPS and Tax Rate Details and Gross</b>		For the purpose of the school entitlement to avail of the scheme	Retain for duration of employment plus 7 years (6 years in which to	'Legal Obligation'

amount of the donation	P	of tax relief for donations of money they receive. To claim the relief, the donor must complete a certificate (CHY form) and forward it to the school to allow it to claim the grossed up amount of tax associated with the donation, and for the keeping of Financial Accounts and Revenue records.	take a claim against the school, plus 1 year for proceedings to be served on the school)	
Charitable Donor's Signature	P	For the purpose of the school entitlement to avail of the scheme of tax relief for donations of money they receive. To claim the relief, the donor must complete a certificate (CHY form) and forward it to the school to allow it to claim the grossed up amount of tax associated with the donation, and for the keeping of Financial Accounts and Revenue records.	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
Creditor's Name & Address	P	Processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills and Revenue	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
Creditor's Contact Details		Processed for the performance of the	Retain for duration of employment	'Legal Obligation'

	<b>P</b>	functions conferred under enactment of secondary legislation by the Department of Education and Skills and Revenue	plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	
<b>Creditor's PPS Number &amp; Tax Details</b>	<b>P</b>	Processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills and Revenue	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'
<b>Creditor's Bank Details and Finance Payment Records</b>	<b>P</b>	Processed for the performance of the functions conferred under enactment of secondary legislation by the Department of Education and Skills and Revenue	Retain for duration of employment plus 7 years (6 years in which to take a claim against the school, plus 1 year for proceedings to be served on the school)	'Legal Obligation'

## Appendix “E”

### Covid-19 related Personal Data and Purpose of Processing

Category	Personal (P) / Special (S)	Purpose of Processing of Data	Duration of Retention of Data	Lawful Basis of Processing Personal Data

No.	Category	Purpose for Processing
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123	Forename	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.
124	Surname	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.
125	Address	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.
126	Details of Attendance (date, times) and any contact tracing related details.	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.
127	Telephone number	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.
128	Health Information or concerns re symptoms or diagnosis of Covid-19 virus	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.
129	Details of any close contact of a confirmed or suspected case of Covid-19	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.
130	If advised by Dr to Cocoon	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.
131	If advised by Dr to self-isolate	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.

132	<b>Position of Employment</b>	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.
133	<b>Confirmation of completion of Return to Work induction Covid-19 training</b>	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.
134	<b>Travel Details</b>	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.
135	<b>Signature of Person</b>	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.