

Privacy Notice for Employees (ROI)

In accordance with the Data Protection Legislation, we have implemented this privacy notice to inform you, as an employee of Depaul, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

B) TYPES OF DATA HELD

We keep several categories of personal data on our employees in order to carry out effective and efficient processes. We keep this data in employees' personnel files potentially in both paper and electronic formats.

Specifically, we hold the following types of data:

- a) personal details such as name, address, phone numbers;
- b) name and contact details of your next of kin;
- c) your photograph where provided;
- d) your gender;
- e) right to work documentation where relevant;
- f) information gathered via the recruitment process such as that entered into a CV or included in a CV cover letter;
- g) references from former employers;
- h) details on your education and employment history etc;
- i) driving licence as required for role.

C) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Carrying out checks in relation to your right to work in the Republic of Ireland	Legal obligation
Making recruitment decisions in relation to both initial and subsequent employment e.g. promotion	Our legitimate interests
Making decisions about salary and other benefits	Our legitimate interests
Making decisions about contractual benefits to provide to you	Our legitimate interests
Assessing training needs	Our legitimate interests
Dealing with legal claims made against us	Our legitimate interests
Preventing fraud	Our legitimate interests

D) SPECIAL CATEGORIES OF DATA

Special categories of data as per GDPR are data relating to your:

- a) Physical and mental health
- b) Sex life
- c) Sexual orientation
- d) Race or Ethnic origin
- e) Political views
- f) Religious or Philosophical n
- g) Trade Union membership
- h) Genetic and Biometric data.

The only special categories of data that we process are in relation to your health and specifically your fitness for work and our lawful purpose for doing that is in the context of your employment by our company.

E) FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract of employment with you. This could include being unable to offer you employment, or administer contractual benefits.

F) WHO WE SHARE YOUR DATA WITH

Employees within our company who have responsibility for people management will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

We may also share your data with third parties as reasons such as P&O Customer Relations Management Systems, Processing Payroll, Training Records (IT systems to store employee details) or for other reasons to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

G) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes and robust cybersecurity measures to guard against such.

H) RETENTION PERIODS

We only keep your data for as long as you are employed by the company and for as long thereafter as may be required for other lawful purposes e.g. pensions administration. See our Record Retention Policy Q&C05 for more details. Certain financial information e.g. payroll records may be kept for seven years to meet legal obligations.

I) AUTOMATED DECISION MAKING

Automated decision making means making decisions about you using no human involvement e.g. using computerised filtering equipment. We do not make any decisions in relation to employees nor do we process any employees' personal data using wholly automated processes.

J) YOUR RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. We operate a separate Data Subject Access Request policy Q&C04 and all such requests will be dealt with accordingly;
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

If you wish to exercise any of the rights explained above, please contact designated DPO, which is the Snr Quality and Compliance Manager by email dpo@depaulcharity.net.

K) MAKING A COMPLAINT

If you think your data rights have been breached, you can lodge a complaint with the Data Protection Commission. The most effective way to contact the DPC regarding queries or concerns you may have is by means of completing, in full, the questions asked on the [webform](#) which can be accessed on [DPC website](#).

You can also contact the Data Protection Commission, by contacting the Helpdesk at (01) 765 01 00 or 1800 437 437, Monday to Friday from 9.30am – 1pm or by sending the correspondence to the Data Protection Commission, 6 Pembroke Row, Dublin 2, D02 X963, Ireland.

L) DATA PROTECTION COMPLIANCE

Our appointed compliance officer in respect of our data protection activities is:

Barbara Corcoran, Snr Quality and Compliance Manager
dpo@depaulcharity.net
Ground Floor, 5 Lamps, Amiens St, Dublin 1, D01 A7V2
Phone: 01 4537111