

Data Protection Policy

SeeBeyondBorders Ireland

Introduction

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

The aforementioned legislation describes how organisations — including SeeBeyondBorders, Ireland— must collect, handle and store personal information. These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that personal data must be:

1. obtained and processed fairly
2. kept for one or more specified and lawful purpose(s)
3. processed in ways compatible with the purposes for which it was given initially
4. kept safe and secure
5. kept accurate and up-to-date
6. adequate, relevant and not excessive
7. retained no longer than is necessary for the specified purpose(s)
8. copied and given to any individual on his/her request

Rationale

SeeBeyondBorders, Ireland must comply with the Data Protection principles set out in the relevant legislation. This Policy applies to all Personal Data collected, processed and stored by SeeBeyondBorders, Ireland in relation to its employees, trustees, service providers, donors, supporters and others (e.g. event participants) in the course of its activities. SeeBeyondBorders,

Ireland makes no distinction between the rights of Data Subjects who are employees, and those who are not. All are treated equally under this Policy.

Scope

The policy covers both personal and special categories of personal data held in relation to data subjects by SeeBeyondBorders, Ireland. The policy applies equally to personal data held in manual and automated form.

All personal and special categories of personal data will be treated with equal care by SeeBeyondBorders, Ireland. Both categories will be equally referred-to as Personal Data in this policy, unless specifically stated otherwise.

SeeBeyondBorders, Ireland as a Data Controller

In the course of its daily organisational activities, SeeBeyondBorders, Ireland acquires, processes and stores personal data in relation to:

- Employees of SeeBeyondBorders, Ireland
- Volunteers of SeeBeyondBorders, Ireland
- Consultants/Service providers engaged by SeeBeyondBorders, Ireland
- Participants at SeeBeyondBorders, Ireland meetings/events/conferences
- Recipients of SeeBeyondBorders, Ireland newsletters/communications
- Donors of SeeBeyondBorders, Ireland

In accordance with Data Protection legislation, this data must be acquired and managed fairly. SeeBeyondBorders, Ireland is committed to ensuring that its employees, volunteers and trustees have sufficient awareness of the legislation in order to be able to anticipate and identify a Data Protection issue, should one arise. In such circumstances, employees/volunteers/trustees must ensure that the Data Protection Administrator is informed, in order that appropriate corrective action can be taken.

In general terms, the employee should consult with the Data Protection Administrator to seek clarification.

Subject Access Requests

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

It is intended that by complying with these guidelines, SeeBeyondBorders, Ireland will adhere to best practice regarding the applicable Data Protection legislation.

Third-Party processors

In the course of its role as a Data Controller, SeeBeyondBorders, Ireland engages a number of Data Processors to process Personal Data on its behalf. In each case, a formal, written contract is in place with the Processor, outlining their obligations in relation to the Personal Data, the specific purpose or purposes for which they are engaged, and the understanding that they will process the data in compliance with the Irish Data Protection legislation. These Data Processors include auditors, fundraising platforms, payroll processors and online payment system providers.

The Data Protection Principles

The following key principles are enshrined in the Irish legislation and are fundamental to SeeBeyondBorders, Ireland's Data Protection policy.

In its capacity as Data Controller, SeeBeyondBorders, Ireland ensures that all data shall:

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

For data to be obtained fairly, the data subject will, at the time the data is being collected, be made aware of:

- The identity of the Data Controller (SeeBeyondBorders, Ireland)
- The purpose(s) for which the data is being collected
- The person(s) to whom the data may be disclosed by the Data Controller
- Any other information that is necessary so that the processing is fair.

SeeBeyondBorders, Ireland will meet this obligation in the following way.

- Where possible, the informed consent of the Data Subject will be sought before their data is processed;

- Where it is not possible to seek consent, SeeBeyondBorders, Ireland will ensure that collection of the data is justified under one of the other lawful processing conditions – legal obligation, contractual necessity, etc.;
- Processing of the personal data will be carried out only as part of SeeBeyondBorders, Ireland’s lawful activities, and SeeBeyondBorders, Ireland will safeguard the rights and freedoms of the Data Subject;
- The Data Subject’s data will not be disclosed to a third party other than to a party contracted to SeeBeyondBorders, Ireland and operating on its behalf.

2. *be obtained only for one or more specified, legitimate purpose.*

- SeeBeyondBorders, Ireland will obtain data for purposes which are specific, lawful and clearly stated. A Data Subject will have the right to question the purpose(s) for which SeeBeyondBorders, Ireland holds their data, and SeeBeyondBorders, Ireland
- will be able to clearly state that purpose(s).

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

Any use of the data by SeeBeyondBorders, Ireland will be compatible with the purposes for which the data was acquired.

4. *be kept safe and secure.*

- SeeBeyondBorders, Ireland will employ high standards of security in order to protect the personal data under its care. Appropriate security measures will be taken to protect against unauthorised access to, or alteration, destruction or disclosure of any personal data held by SeeBeyondBorders, Ireland in its capacity as Data Controller.

Access to and management of employee and service provider records is limited to those employees/trustees with appropriate authorisation and password access.

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

SeeBeyondBorders, Ireland will:

- ensure that administrative and IT validation processes are in place to conduct regular assessments of data accuracy;

- conduct an annual review to ensure that relevant data is kept accurate and up-to-date.