

**Na Píobairí Uilleann**

**Data Protection Policy**



## **Introduction**

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

## **Rationale**

Na Píobairí Uilleann 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 Na Píobairí Uilleann in relation to its staff, service providers, members and clients in the course of its activities. Na Píobairí Uilleann 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 sensitive personal data held in relation to data subjects by Na Píobairí Uilleann. The policy applies equally to personal data held in manual and automated form.

All personal and sensitive personal data will be treated with equal care by Na Píobairí Uilleann. Both categories will be equally referred-to as Personal Data in this policy, unless specifically stated otherwise.

## **The Data Protection Principles**

The following key principles are enshrined in the Irish legislation and are fundamental to the Charities Institute Ireland's Data Protection policy. Further details on procedural implementation of these policies can be found in the Data Protection Procedures document.

In its capacity as Data Controller, Na Píobairí Uilleann ensures that all data shall:

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

2. .... be obtained only for one or more specified, legitimate purposes.
3. .... not be further processed in a manner incompatible with the specified purpose(s).
4. .... be kept safe and secure.
5. ... be kept accurate, complete and up-to-date where necessary.
6. ... be adequate, relevant and not excessive in relation to the purpose(s) for which the data were collected and processed.
7. ... not be kept for longer than is necessary to satisfy the specified purpose(s).
8. ... be managed and stored in such a manner that, in the event a data subject submits a valid subject access request seeking a copy of their personal data, this data can be readily retrieved and provided to them.

### **Definitions**

For the avoidance of doubt, and for consistency in terminology, the following definitions will apply within this Policy.

### **Data**

This includes both automated and manual data.

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

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

### **Personal Data**

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

### **Sensitive Personal Data**

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

### **Data Controller**

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

### **Data Subject**

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

### **Data Processor**

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

### **Data Protection Officer**

A person appointed by Na Píobairí Uilleann to monitor compliance with the appropriate Data Protection legislation, to deal with Subject Access Requests, and to respond to Data Protection queries from staff members and service recipients.

### **Relevant Filing System**

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

**Na Píobairí Uilleann is registered in Dublin, Ireland, with registered address:  
15 Henrietta Street, Dublin 1**

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