

CORK DEAF ASSOCIATION STUDENT PRIVACY STATEMENT

In accordance with the General Data Protection Regulation (GDPR), we have created this student privacy statement to inform you, our students, of the types of data we process about you. We also include within this statement:

- the reasons for processing your data
- the lawful basis for processing data
- information on data retention
- your rights regarding your data.

This statement applies to Cork Deaf Association course students.

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, obvious, 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 corrected or deleted without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a secure way to protect against unauthorised or unlawful processing, accidental loss, destruction or damage.

B) TYPES OF DATA PROCESSED

We process the following data on our students:

- a) Name, address, telephone number, email address.
- b) If you are doing an exam-based course, we will process video footage of your exams and your student ID numbers when necessary
- c) If you are doing an exam-based course, you will be asked if you require any reasonable adjustments in order to undertake assessments. If you say yes, then you will be asked to submit medical evidence to support the application. Medical evidence submitted as part of an application for assessment reasonable adjustments will be forwarded to *Signature* as soon as possible. A copy will not be retained by Cork Deaf Association.
- d) If you inform us that you require reasonable adjustments to be made to participate in any of our courses, we will only retain that information for the duration of the course that you have signed up for.

C) COLLECTING YOUR DATA

Student data is kept within our computer/IT systems and within hard copy files. We do not keep copies of any medical evidence submitted in relation to assessments. This is sent directly to *Signature*.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. If you register as a student with us, we process your information only for the following reasons:

- You have given your consent for us to process your information
- the data processing is necessary for the performance of a contract
- Using the data is necessary for the purpose of our legitimate interests (so that we provide a service to you), except when this might interfere with the individuals' rights, especially when the individual is a child.

If you register for a course with us, we will use your information for some or all of the following purposes:

- To update you on course information, including any changes to the class schedule
- To let you know if there are any opportunities to practice your Sign Language at Signing events
- To register you for exams if you are participating in an exam-based course
- To send you your exam results if you are participating in an exam-based course

Please note that video recordings are also made of individual student exams so that the student can be assessed and graded. Videos will also be referred to if a result is appealed.

E) SPECIAL CATEGORIES OF DATA

Special categories of data are data relating to your:

- a) health

- b) sex life
- c) sexual orientation
- d) race
- e) ethnic origin
- f) political opinion
- g) religion
- h) trade union membership
- i) genetic and biometric data.

We carry out processing activities using special category data to determine reasonable adjustments and only do so if you have given your consent.

F) CRIMINAL CONVICTIONS AND OFFENCES

We do not process criminal conviction data in relation to students.

G) FAILURE TO PROVIDE DATA

If you do not give us data, it may mean that we cannot provide you with a service.

H) WHO WE SHARE YOUR DATA WITH

If you are doing an exam-based course, we will share your information and exam video recordings with Irish Sign Language awarding body, *Signature*. This company is based in the UK. Their Data Commitment Statement can be reviewed through this online link:

<https://www.signature.org.uk/data-commitment>.

Please note that we do hire an external IT company to manage our IT systems and we use a cloud-based IT system. This is necessary in order for us to maintain an efficient service. We also use the services of an external, confidential data destruction company. Further details as follows:

- a) General IT support (Compunet)
- b) Email system and online documents (Outlook 365)
- c) Website development and maintenance (Jamjo)
- d) Email subscriber management (mailchimp)
- e) Confidential document destruction (Rehab Recycling)

I) PROTECTING YOUR DATA

We know that we have to make sure your data is kept safe and protected against being accidentally lost, seen by people who shouldn't see it, destroyed or not used in the right way. We have put measures in place to protect against any of these things.

J) RETENTION PERIODS (How long we keep data)

Our policy is to keep your information only as long as is necessary and for only as long as it adheres to one of the above mentioned lawful purposes. Our retention periods are as follows:

- The student registration forms are part of our financial company records and will be retained for six years, according to legal requirements.
- Other student information is kept only as long as is necessary. For example, class lists kept on our databases will be deleted when no longer required for the purposes outlined above.
- *Signature* obliges us to keep copies of exam recordings for three years.
- *Signature* will retain your information indefinitely as a record of your qualifications obtained and your level of study reached. Cork Deaf Association staff can access this information through the *Signature* online portal.
- Medical evidence submitted as part of an application for assessment reasonable adjustments will be forwarded to *Signature* as soon as possible. A copy will not be retained by Cork Deaf Association.

Any documents and recordings which are no longer required will be confidentially destroyed and removed from our IT systems.

K) AUTOMATED DECISION MAKING

Automated decision-making means making decisions about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

L) DATA SUBJECT 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. (More information on this can be found in our separate policy on *Subject Access Requests* available on our website or through the Manager);
- c) the right for any wrong data we hold on you 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.

M) CONSENT

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time.

N) MAKING A COMPLAINT

You can view our *Data Breach Policy* on our website or by request through the Manager (details below).

If you think your data rights have been breached, you are able to raise a complaint with:

Office of the Data Protection Commissioner. Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23, Ireland.

Phone +353 (0761) 104 800 | LoCall 1890 25 22 31

Fax +353 57 868 4757 Email info@dataprotection.ie

O) DATA PROTECTION COMPLIANCE

The CDA Manager is responsible for data protection compliance. Please don't hesitate to contact the Manager if you have any queries, concerns or complaints in relation to data protection:

Name: Gerrie O' Grady

Phone: (021) 4505944

Email: gerrie@corkdeaf.ie

For further information on data protection policies and forms, see our section on Data Protection on our website

www.corkdeaf.ie/data-protection