



Data Protection Policy

Introduction

This is a statement of the practices of Holocaust Education Trust Ireland (HETI), of Clifton House, Lower Fitzwilliam Street, Dublin 2 Ireland in connection with the capture of personal data through our application forms and website and the steps taken by the HETI to respect your privacy.

HETI fully respects your right to privacy and actively seeks to preserve the privacy rights of those who share information with HETI. Any personal information which you volunteer to HETI will be treated with the highest standards of security and confidentiality, in accordance with Irish and European Data Protection legislation.

Personal data will be processed in accordance with the General Data Protection Regulation (GDPR) 2018, the Irish Data Protection Act (1988), and the Irish Data Protection (Amendment) Act (2003).

HETI 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 HETI in relation to its staff, service providers and clients in the course of its activities.

HETI makes no distinction between the rights of Data Subjects who are employees, and those who are not. All are treated equally under this Policy. The policy applies equally to personal data held in manual and automated form.

This policy applies to;

- any person who is employed or engaged by HETI who processes personal data in the course of their employment or engagement;
- individuals who are not directly employed by HETI, but who are engaged as contractors (or subcontractors) and who process personal data in the course of their duties for HETI.

The Data Protection Policy explains the following:

- How do we collect and use your personal data?
- The purpose and legal basis for collecting your personal data
- How do we store and secure personal data?
- Details of third parties with who we share personal data
- What are your rights?

How do we collect your personal data?

The data we collect from you will be used by HETI only in accordance with the purposes outlined in this privacy

notice. We will collect your data in the following manner:

- Teacher Education application forms.
- The Crocus Project application forms.
- School programmes waiting lists.
- Third party cookies from the HETI website.
- Contact Us form on HETI website.
- Applications for Holocaust Memorial Day invitations.
- Sign up to join the HETI mailing list.
- Employee Contracts and personnel documentation.

HETI staff will access your personal data, collected in the ways outlined above, in order to:

- Organise education programmes for schools and CPD courses for teachers.
- Manage Holocaust Memorial guest list and post invitations to attendees.
- Add your data to HETI mailing lists with your consent.
- Process payroll payments.
- Maintain personnel files.
- 3rd party website cookies.

If you have any queries or complaints in relation to the use of your personal data you can contact the Data Protection Officer for HETI as follows:

Data Protection
Holocaust Education Trust Ireland,
Clifton House, Lower Fitzwilliam Street,
Dublin 2, Ireland.

info@hetireland.org

Children

If you are under 18, please ensure that you have a parent or guardian's permission before providing HETI with any personal information.

If you provide us with any personal information we will assume that you are over 18 and that you accept the terms of this Privacy Statement, unless you inform us otherwise.

The purpose and legal basis for collecting your data

The data we collect about you will be used for the purpose of delivering HETI's education and remembrance programmes and to promote our work via mailing lists. In order to deliver these purposes, HETI will collect your name, address, email, mobile number, emergency contact name and mobile number, copy of passport ID page, medical and dietary requirements.

HETI will ensure that your data is processed fairly and lawfully in keeping with the principles of data protection. For the purposes outlined in this Data Protection Policy your personal data will be processed on following legal bases;

- **Consent:** For direct marketing collected via programme application forms.

- **The formation of a contract:** Employment contracts and delivery of our education programmes.
- **Statutory requirement:** Terms of Employment (Information) Act 1994 .
- **Vital interest:** The collection of next of kin data of employees and programme participants in the event of an accident or emergency.

How we store and secure your data

Any data we collect from you will be stored confidentially and securely. Your personal information is protected by a secure system both online and offline. Your information will be stored on a secure cloud storage network which seeks to prevent loss, misuse, unauthorised access or disclosure, alteration or destruction of this information. We will always endeavour to protect your personal information from loss, misuse, unauthorised access or disclosure, alteration or destruction. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Data Protection Policy.

Unfortunately, no collection or data transmission over the Internet can be guaranteed to be 100% secure. Thus, while we strive to protect your personal information, we cannot ensure or warrant the security of any transmission and you transfer the personal data at your own risk. We will not be liable for any loss or damage caused by a distributed denial-of-service ("DDoS") attack, viruses, malware or other technologically harmful material that may infect your computer equipment, computer programs, data or other proprietary material due to your use of this Website or to your downloading of any material posted on it, or on any website linked to it.

HETI is committed to ensuring all accesses to, uses of, and processing of personal data is performed in a secure manner. In keeping with the data protection principles we will only store your data for as long as is necessary. For the purposes described here we will store your data for the following retention periods;

Operational Purposes:

- Teacher Education programme application forms –3 years, digital data pseudonymised thereafter*
- School Education Programmes – 3 years after delivery of programme, digital data pseudonymised thereafter*
- Teacher and Events Mailing Lists – Indefinitely once proof of consent is provided, unless consent is withdrawn by data subject*
- Terms of Employment / Contracts – 6 years
- Payroll – 6 years
- Job applications – 6 months
- Holocaust Memorial Day mailing lists – 3 years

**In cases where consent for HETI mailing lists is indicated on a programme application form which contains personal data, the hard copy will be securely filed until consent is withdrawn.*

When we store your personal data on our systems the data will be stored either on HETI premises or on secure IT platforms which are also subject to European data protection requirements.

- Conference of Material Claims Against Germany - as part of our grant reporting requirements we are obliged to share some information regarding our programme participants. All personal data is pseudonymised prior to submitting reports.
- DropBox - data stored in the US.
- Mail Chimp - data stored in the US.

Details of third parties with whom we share personal data

HETI will share your data with third parties where necessary for purposes of the processing outlined here. HETI will share your data with the following third parties:

- Trinity College Dublin, a third level educational institute may only have access to the data for the purpose of facilitating HETI's Teacher Education programmes and awarding the Certificate in Holocaust Education.
- Dropbox, an IT service provider may access encrypted data for the purpose of storing HETI's server.
- Mailchimp: For the purpose of delivering HETI's newsletters and annual Crocus Project Survey.
- Blacknight, an IT service provider may only have access to the data for the purpose of hosting HETI's website.
- TechPoint, an IT service provider may only have access to the data for support purposes.
- GWS, HETI's payroll administrator may only access HETI employees' personal data for the purpose of salary payments and statutory requirements.
- Conference of Material Claims Against Germany: For the purpose of grant reporting we are required to share some pseudonymised personal data.

When we share your data with the third parties outlined here HETI will ensure that the data is only processed according to our specific instructions and that the same standards of confidentiality and security are maintained. Once the processing of the data is complete any third parties with whom data was shared will be required to return the data to HETI save where they are required to retain it by law.

What are your rights?

You have the following rights over the way we process your personal data.

Right of Access

You have the right to request a copy of the personal data we are processing about you and to exercise that right easily and at reasonable intervals.

Consent

You have the right to withdraw your consent where that is the legal basis of our processing.

Rectification

You have the right to have inaccuracies in personal data that we hold about you rectified.

Erasure

You have the right to have your personal data deleted where we no longer have any justification for retaining it subject to exemptions such as the use of pseudonymised data for *grant reporting and audit purposes*.

Object

You have the right to object to processing your personal data if:

- We have processed your data based on a legitimate interest or for the exercise of the public tasks of HETI if you believe the processing to be disproportionate or unfair to you.
- The personal data was processed for the purposes of direct marketing or profiling related to direct marketing.
- We have processed the personal data for scientific or historical research purposes or statistical purposes unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Restriction

You have the right to restrict the processing of your personal data if:

- You are contesting the accuracy of the personal data;
- The personal data was processed unlawfully;
- You need to prevent the erasure of the personal data in order to comply with legal obligations;
- You have objected to the processing of the personal data and wish to restrict the processing until a legal basis for continued processing has been verified.

Portability

Where it is technically feasible you have the right to have a readily accessible machine readable copy of your data transferred or moved to another data controller where we are processing your data based on your consent and if that processing is carried out by automated means.

Contact

If you have any queries relating to the processing of your personal data for the purposes outlined above or you wish to make a request in relation to your rights you can contact HETI at info@hetireland.org with Data Protection Enquiry in the email title

If you wish to make a complaint or escalate an issue relating to your rights you can contact HETI at info@hetireland.org with Data Protection Complaint in the email title

Finally, if you are not satisfied with the information we have provided to you in relation to the processing of your data or you can also make a complaint to the Data Protection Commissioner via <https://forms.dataprotection.ie/contact>.

Last updated by M.Ronan 18/10/2021

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