

# Privacy Statement

This is the Role Skillnet privacy statement. Role Skillnet address is Role Skillnet, Boyle Enterprise Centre, Boyle for the purposes of complying with the Data Protection Acts 1988-2018, the European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011 (SI 336) and Regulation 2016/679 GDPR.

The foundation of data protection as it applies to personal data is built upon 6 data protection principles:

1. Lawfulness, fairness and transparency.
2. Purpose limitations.
3. Data minimisation.
4. Accuracy.
5. Storage limitations.
6. Integrity and confidentiality

We want you, our members, staff, and visitors, viewing this website to be informed as to our use and care of your personal data.

By visiting the website, you are deemed to be on notice of, and in agreement with, the manner in which we collect and process personal data which we receive via this website. If you do not agree with the manner in which we collect and process personal data, you should stop using this website now and not revisit. We hope you will stay with us though.

## **Role Skillnet Policy on Data Protection**

Your right to privacy is recognised and respected. ROLE SKILLNET will not collect any personal information about you on this website without your clear permission. Any personal information which you volunteer to us will be treated with the highest standards of security and confidentiality in full compliance with the provisions of current valid law.

We do not collect any personal data about you on this website, apart from the information you volunteer. Any information you provide in this way will not be made available to any third parties unless we have received your express consent or unless we are obliged to do so by law. We may use data which you have submitted to us for statistical, market research, search engine optimisation (SEO) or promotional purposes in the normal way. ROLE SKILLNET will prohibit any third party linking data to you.

The contact page on the Role Skillnet website invites you to provide:

- Your name
- Your e-mail address
- Subject/Message

### **Obtaining Copies of Your Data**

If your right of access to the data which you have requested is not restricted by an exemption under the Data Protection Acts, and is correctly requested, we will supply a copy of any personal data relating to you which we have received from you via this website. We are entitled to destroy any personal data which you submit to us at our discretion and will do so for security and/or data minimisation reasons where appropriate. If we have destroyed any personal data which you have supplied to us we will not have any obligation to supply you with copies of this destroyed data or verification of the destruction. We will endeavour to provide you with a personal data destruction date if available.

If you wish to obtain copies of any personal data which we hold, you must write to us at: Role Skillnet, Boyle Enterprise Centre, Quarry Lane, Boyle or email us at [info@roleskillnet.com](mailto:info@roleskillnet.com). You should include any personal identifiers such as your name, address, phone number, e-mail etc. For obvious data security reasons, we may require that you provide us with a valid photo identification to facilitate the access request. Indeed, we reserve the right to require, see and confirm photo identification before passing any personal data to a requestor.

If you make a request in respect of your personal data, we will comply with this request within 30 days of receiving it in writing.

### **Correcting Inaccurate Information**

If you discover that we hold inaccurate information about you, you can request that we correct that information and Role Skillnet would very much encourage you to do so. Any such request must be in writing and should be transmitted to us either by post or by email referred to above. We may require photo identification to confirm and fulfil the request. We will review permissions already given by you before any actions are taken in respect of any further processing and update these as or if required by contacting you.

### **Deleting Your Data**

In certain circumstances you may also request that data which you have supplied be deleted. If you wish to request a deletion, you will be expected to identify some contravention of data protection law in the manner in which we have processed the data which you require to be deleted. We may require photo identification to confirm and fulfil the deletion/rectification request. If you have concerns about how personal data are processed via this website or indeed have any other relevant complaints, please do not hesitate to bring these to the attention of Role Skillnet by calling 071-9673440 or emailing [info@roleskillnet.com](mailto:info@roleskillnet.com).

### **Right to Communicate**

If you provide us with any postal or email address, we may, where appropriate, and with your consent as necessary, communicate with you by post or email to provide you with promotional information regarding services which we provide or to keep you informed of any relevant matters which we believe might be of some interest to you. If you do not wish to receive this information from us you must notify us of this in writing, either by post or email (unsubscribe), at [info@roleskillnet.com](mailto:info@roleskillnet.com) or by writing to Role Skillnet, Boyle Enterprise Centre, Quarry Lane, Boyle.

### **Purpose of data collection/processing**

The Data Protection Act states that the purpose(s) for which the data are processed must be 'specified, explicit and legitimate'. Role Skillnet outlines the following purposes for which they process data:

Role Skillnet collects, processes, and retains personal data for the following reasons:

- To communicate with, inform and answer queries from prospective, current, or past members, customers, and visitors.
- To deliver relevant information to you
- To initiate and provide a quality legitimate service
- To fulfil obligations under law. E.g. the Data Protection Acts 1988-18, SI 336 2007, Regulation 2016/679 GDPR
- To inform prospective, current, or past customers and visitors of further relevant information and activities as agreed. E.g. Information about new services, offers, training etc.
- To carry out our lawful responsibilities as a business in a viable manner
- To facilitate necessary communications between relevant members, customers, visitors, and systems to process and progress legitimate goals and activities.

The above list is not exhaustive given the broad nature of Role Skillnet services and therefore this statement will be reviewed to reflect this variability as required.

The general personal data legitimate processing conditions under law underlying the purpose(s) of data collection by Role Skillnet are:

- You (prospective or previous) provided consent
- To prevent injury or other damage to you (the data subject): or serious loss of or damage to your property or otherwise to protect your vital interests
- Necessary for the administration of justice
- Necessary under an enactment
- That the processing serves an official function; or
- Where necessary for the purposes of the legitimate interests pursued by ROLE SKILLNET or by any lawful third party in the absence of reasons which prejudice your fundamental rights and freedoms or your (the data subject's) legitimate interests.

### **Data collected must be adequate, relevant, and not excessive**

Role Skillnet adheres to the principle that data gathered must be adequate, relevant, and not excessive. It is important to note here that laws, rules, and practices can evolve or change, so this will be reflected in the application and the operative spectrum of the three guiding principles below.

**Adequate:** To provide the services on offer, personal data must be gathered for the purpose of communication, information, administration, and legal compliance.

**Relevant:** Only personal data germane, appropriate, and necessary under law to the requirements of the services/activities provided and legitimate interests of ROLE SKILLNET are sought.

**Not excessive:** The necessity of having an 'upper limit' of personal data collection is acknowledged. Role Skillnet is mindful of the potential for 'excessive data creep'.

### **Data Retention/Destruction and Minimisation**

Role Skillnet seeks to minimise the quantum of personal data held. To facilitate this, unnecessary and/or superfluous data will be deleted/discarded in a secure manner. Where information must be held e.g. under a legal obligation, all files (electronic and hard copy) are protected securely by Role Skillnet.

### **Interception by Third Parties**

While we will treat any personal data received from you in accordance with the terms set out in this privacy statement and we will take all reasonable steps to store the data securely. However, we cannot ensure that your data is not intercepted by third parties in the course of being transmitted to us. In the event that any information is intercepted when being transmitted to us via the internet we bear no responsibility or liability to you for the manner in which any such intercepted data is used by any third parties.

### **External Links**

This privacy statement relates only to the website of Role Skillnet. We may have links to external websites on our website. Any external links to other websites will be/are clearly identifiable as such. We do not have any control over the privacy policies or the terms of use of any of these external websites. In the event that you visit any of these sites, whether by means of following the link on our page or otherwise, we will bear no responsibility or liability to you in respect of any such external websites, whether in respect of the manner in which your personal data is processed or otherwise. The fact that we have placed a link to an external website on our website does not signal that we agree with or endorse any statement which is contained on any such external website.

### **Changes to Our Policy**

Role Skillnet reserves the right to make changes to this privacy statement from time to time. Also, any changes to our in-house privacy policy will be reflected in our privacy statement where appropriate and will normally be posted on this page. Accordingly, if you visit this website regularly you should consult this page periodically to ensure that you are aware of our current privacy and data protection notifications.

### **Details of data transfers to third a country**

Role Skillnet does not transfer personal data to third countries beyond the administration of 'certificates of origin' as officially authorised by the Department of Foreign Affairs & Trade and Chambers Ireland.

### **Role Skillnet**

Role Skillnet has partnered with Skillnet Ireland. The object of this partnership is to facilitate enterprise training and workforce development in the North West. Please see Skillnet privacy statement relating to trainees <https://www.skillnetireland.ie/data-protection/>. Skillnet Ireland's main role is the promotion and facilitation of enterprise training and workforce learning as key elements in sustaining Ireland's national competitiveness and economic recovery. Skillnet Ireland was established in 1999 and is funded from the National Training Fund (NTF) through the Department of Education and Skills (DES). Skillnet Ireland is a limited company.

### **The existence of each of data subject's rights**

Individuals (data subjects) are provided (GDPR 2016/679 Arts 12-22, DPA 2018 S. 89-95, 56-59) with the following rights to (summary):

- Transparent information and clear communication regarding their data
- Information as to how the subject's data was collected
- Information as to how the subject's data was collected but not from the subject him or herself
- Access by the data subject
- Rectification of data
- Erasure of data (Right to be forgotten)
- Restriction of processing
- Notification of rectification, erasure, or processing
- Data portability
- Object to processing
- Object to automated processing/decision-making including profiling

### **Withdrawing Consent**

An individual (data subject) has the right to withdraw consent at any time, where relevant. Should you wish to withdraw consent please contact Role Skillnet, Boyle Enterprise Centre, Quarry Lane, Boyle, email us at [info@roleskillnet.com](mailto:info@roleskillnet.com) or call 071-9673440.

### **Automated decision-making, profiling decisions**

Role Skillnet does not engage in automated decision-making currently

### **Personal Data Retention period**

**Personal data is only retained as long as it is needed or to fulfil a legal obligation**

Role Skillnet holds personal data under various legal obligations including:

- The Terms of Employment (Information) Act, 1994 require that an employee's terms and conditions of employment be retained for the duration of their employment.
- The National Minimum Wage Act, 2000, at section 22, provides for a 3 year retention period to show compliance with the Act's provisions, for example, payslips showing the employees were paid at least minimum wage.
- The Organisation of Working Time Act, 1997, at section 25, and the Organisation of Working Time (Records) Prescribed Form and Exemptions) Regulations 2001, provide for a 3 year retention period for records of weekly working hours, the Role Skillnet employee's PPS numbers and a statement of their duties.
- The Protection of Employment Acts, 1977-2007, at section 18, provides that where an employer has collective redundancies, it must retain the records to show that the provisions of the Act were complied with for a 3 year period

### **Personal data source and whether it came from publicly accessible sources**

Role Skillnet retains services from approved providers for marketing and logistics in the normal way. Further information is provided in our internal privacy policy, copies of which, are shared where appropriate and relevant.

### **Data Protection Commissioner**

The Data Protection Commission office provides a wealth of helpful information and can be viewed here <https://www.dataprotection.ie/>