



Educate
Together

Privacy Policy

Effective date: 25th May, 2018

Educate Together ("us", "we", or "our") operates the www.educatetogether.ie website (the "Service"). This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data. We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from www.educatetogether.ie

Definitions

Service

Service is the www.educatetogether.ie website operated by Educate Together

Personal Data

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

Usage Data

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Cookies

Cookies are small pieces of data stored on your device (computer or mobile device).

Data Controller

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

Data Processors (or Service Providers)

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

Data Subject (or User)

Data Subject is any living individual who is using our Service and is the subject of Personal Data.

Information Collection And Use

We collect several different types of information for various purposes to provide and improve our Service to you.

Educate Together

Equity House,

16/17 Upper Ormond Quay, Dublin 7

T +353 1 4292500

F +353 1 4292502

E info@educatetogether.ie

www.educatetogether.ie

Charity No. CHY 11816

Company No. 286202

Types of Data Collected

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, Postal code, City
- Cookies and Usage Data
- PPS numbers

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

Usage Data

We may also collect information on how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Tracking Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service. Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

Use of Data

Educate Together uses the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service

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- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), Educate Together's legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Educate Together may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- To comply with the law

How and why we Process Data

Boards of Management

Boards of Management contact information, training records, details of all related school support calls and Patron Representative information are held in both soft and hardcopy.

Continual Professional Development (CPD)

Course participant information is held within Moodle, by default course participants profile is visible to all course participants. Terms and Conditions within Moodle detail how to hide your visibility.

Expressions of Interest

All 'Expressions of Interest' forms are processed by the national office to express your interest in a school. When the school is opened these forms are transferred to the school and the information is no longer held by the national office. If the school does not open, your information is retained for future schools opening process.

Garda Vetting Applications

Garda Vetting applications are processed according to guidelines provided by the National Vetting Bureau, details of which can be found online:

<https://vetting.garda.ie/VettingProcedure/HowIsVettingConducted>

General Enquiries

General requests for information are responded to and/or forwarded to the necessary party, a copy of your enquiry is also retained in the info@educatetogether.ie mailbox until it is archived after 6 months.

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Regular and One-off Donor Information

On receipt of the above-mentioned we receive your name, contact details, how you would like your donation to be used, and tax information (where provided). This information is used to contact you to thank you, keep you updated of new and existing campaigns, for processing your payment and for processing your tax revenue refund where applicable.

School Enrollments

Prior to a school being opened we may process school enrollments to allocate school places, this information is transferred to the school when it opens.

Job Applications

Job applications are processed for shortlisting, interviewing and appointing new staff members, volunteers and principals.

Unsolicited Job Applications

These are not processed or retained.

Third Party Providers

Adobe connect is used to hold webinars.

Facebook, Instagram, LinkedIn and Twitter are used for social media.

Jotform is used to process *Expressions of Interest* and *School Enrolments*.

Mailchimp is used to process mailing lists.

Microsoft office is used to process emails.

Moodle is used for online continual professional development and online courses.

Salesforce is used as our content relationship management system.

Sentential is used to process direct debits payments.

Retention of Data

Educate Together will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. Please refer to our Retention Policy for full details.

Educate Together will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

Transfer of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Ireland and choose to provide information to us, please note that we transfer the data, including Personal Data, to Ireland and process it there.

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Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Educate Together will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Disclosure of Data

Legal Requirements

Educate Together may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Educate Together
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

Security of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Educate Together aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

The right to access, update or to delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.

The right to object. You have the right to object to our processing of your Personal Data.

The right of restriction. You have the right to request that we restrict the processing of your personal information.

The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

The right to withdraw consent. You also have the right to withdraw your consent at any time where Educate Together relied on your consent to process your personal information.

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Please note that we may ask you to verify your identity before responding to such requests. You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Children's Privacy

For new school enrolments we collect the following information; parent(s) name, address, email, telephone, eircode, child's name, child's date of birth, year to start. This information is stored by Educate Together until the school is opened and fully operational, it is then transferred to the school and becomes their data and pertinent to the school's GDPR privacy policy.

Data Breaches

Article 4 (12) of the General data protection Regulation ("GDPR") defines a data breach as: "a breach of security leading to the unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed."

Where data is misdirected, lost, hacked or stolen, inappropriately accessed or damaged, the incident is properly investigated and reported, and any necessary action is taken to rectify the situation. A data security breach can come in many forms, but the most common are:

- Loss or theft of paper or other hard copy
- Data posted, e-mailed or faxed to the incorrect recipient
- Loss or theft of equipment on which data is stored
- Inappropriate sharing or dissemination
- Staff accessing information to which they are not entitled
- Hacking, malware, data corruption
- Information is obtained by deception or "blagging"
- Equipment failure, fire or flood
- Unescorted visitors accessing data
- Non-secure disposal of data

Reporting a Breach

Suspected data security breaches should be reported promptly to the Data Protection Officer (DPO) as the primary point of contact on 01 429 2500, email: dpo@educatetogether.ie. The report

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must contain full and accurate details of the incident including who is reporting the incident [and what classification of data is involved].

All data security breaches will be centrally logged by the DPO to ensure appropriate oversight in the types and frequency of confirmed incidents for management and reporting purposes.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, please contact us:

- By email: dpo@educatetogether.ie
- By visiting this page on our website: www.educatetogether.ie
- By phone number: 00353 1 4292500
- By mail: Educate Together, Equity House, 16 - 17 Upper Ormond Quay, Dublin 7, Ireland

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