



DATA PROTECTION POLICY

for

Dyspraxia Association of Ireland trading as Dyspraxia DCD Ireland

Charity No. 1011659

Company No 2695822

Data Protection Policy

Version Date	March 2022
Version Number	V.4
Implementation/Approval Date	
Review Date	March 2023
Review Body	
Policy Reference Number	

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Definitions

Organisation	Means Dyspraxia/DCD Ireland
GDPR	The General Data Protection Regulation.
Personal Data/Personally identifiable information/PID	Any information which are related to an identified or identifiable natural person. Also incorporates any de-identified information that by the nature of its parts may enable the person/location to be identified.
PHI/Protected Health Information	Any individually identifiable health information transmitted or maintained in a medical record paper or electronic, or designated data set that was created, disclosed, or used in the course of providing a health care service such as diagnosis, payment or treatment.
Responsible Person/s	The Chief Executive Officer (CEO) and the Data Protection Officer(DPO)
Social Media	Internet based virtual communities and networks such as websites, Facebook, Twitter, Instagram, Snapchat, TikTok etc.,
Data Controller	The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data . Controllers make decisions about processing activities.
Data Processor	The processor or data processor is a person or organization who deals with personal data as instructed by a controller for specific purposes and services offered to the controller that involve personal data processing
Requestor	An individual who on their own behalf or on the authority of another person, requests a copy of any of their personal data held by the organisation or passed on to third party contractors.
Data Subject Access Request (DSAR)	A request to the organization that gives individuals a right to access information about personal data the organization is processing about them and to exercise that right easily at reasonable intervals, in order to be aware of, and verify the lawfulness of the processing.

1.0 Summary

Dyspraxia/DCD Ireland is committed to protecting the privacy and personal data of our members, supporters and other stakeholders in compliance with the Data Protection Acts 1988 and 2003, as amended in 2018, and will comply with all applicable legislation including the General Data Protection Regulation (GDPR 2016/679), and the Irish Privacy and Electronic Communications Regulations 2011. The purpose of this Data Protection Policy is to ensure that a consistent approach and standard is applied by Dyspraxia/DCD Ireland in collecting, using, and managing the Personal Data that the organisation collects. This Policy explains the procedures and principles the organisation follows in collecting, managing, and using Personal Data in full compliance with applicable data protection legislation including the GDPR.

2.0 Data protection principles

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

3.0 General provisions

- This policy applies to all personal data processed by Dyspraxia/DCD
- The Dyspraxia/DCD nominated Data Protection Officer (DPO) shall take responsibility for Dyspraxia/DCD's ongoing compliance with this policy
- This policy shall be reviewed at least biannually

4.0 Lawful, fair and transparent processing

To ensure its processing of data is lawful, fair and transparent, Dyspraxia/DCD shall maintain a Record Management System which shall be reviewed at least annually.

Individuals have the right to access their personal data and any such Data Subject Access Requests made to Dyspraxia/DCD shall be dealt with in a timely manner.

5.0 Lawful purposes

All data processed by Dyspraxia/DCD must be done on one of the following lawful bases:

- consent
- contract
- legal or regulatory obligation
- vital interests
- public task
- legitimate interests

All Personal Data processed by the Organisation shall be done so on the basis of opt – in consent provided directly by each individual providing data.

Consent will be obtained in written form as part of membership joining forms and renewal form. A record will be kept of each written consent.

Where information is obtained orally (by telephone or in person), the person providing Personal Data will be informed upfront that any Personal Data provided will be stored and used in accordance with this Policy.

Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent shall be clearly available and systems shall be in place to ensure such revocation is reflected accurately in Dyspraxia/DCD's systems.

Consent will be recorded in the notes of the call or meeting in Salesforce and or in the Record Management System.

6.0 Data minimisation

Dyspraxia/DCD shall ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

7.0 Personal Data

In carrying out its activities Dyspraxia DCD Ireland collects certain Personal Data from members of the Organisation and from persons contacting and interacting with the Organisation. The Personal Data collected comprises personal identification information including names, email address, home address, phone number.

Dyspraxia/DCD Ireland collects and processes Personal Data in the following circumstances:

- a) Online member registration
- b) Calls made to the Dyspraxia/DCD Helpline.
- c) Email queries sent to info@dyspraxia.ie
- d) Forums, events, and workshop run by the organisation

Personal Data is collected only for the following purposes (**Purposes**):

- a) To enable the Organisation to communicate effectively with its members and other people who may require support or advice from the organisation.
- b) To allow the Organisation to collate de-identified statistical data to support its objectives of promoting awareness and understanding of Dyspraxia/DCD and in relation to obtaining support from Government bodies to further the objectives of the Organisation.
- c) To employ staff and volunteers within the Organisation.

8.0 Accuracy

Dyspraxia/DCD shall take all reasonable steps to ensure personal data is accurate.

Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

The Chief Executive Officer (CEO) has overall responsibility for records management within Dyspraxia/DCD. As the accountable officer and in acting as the Data Protection Officer (DPO) (he/she) is responsible for the management of the organisation and for ensuring appropriate mechanisms are in place to support service delivery and continuity.

9.0 Archiving / removal

To ensure that personal data is kept for no longer than necessary, Dyspraxia/DCD shall put in place a Data Retention policy for each area in which personal data is processed and review this process annually. The Data Retention policy shall consider what data should/must be retained, for how long, and why.

10.0 Security

Dyspraxia/DCD shall ensure that personal data is stored securely using modern software and systems that are kept up-to-date. Access to personal data shall be limited to personnel who need access for legitimate purposes and appropriate security shall be in place to avoid unauthorised sharing of information.

When personal data is deleted this will be done safely such that the data is irrecoverable.

Appropriate back-up and disaster recovery solutions shall be in place.

11.0 Request to delete Personal Identifiable Records

Under GDPR legislation (Article 17), any person has the right to request that any PID is destroyed under 'Right to be Forgotten' unless there is a legal obligation to keep the data or reasons of public interest.

A person has the right to have their data erased, without undue delay, by the data controller, if one of the following grounds applies:

1. Where your personal data are no longer necessary in relation to the purpose for which it was collected or processed.
2. Where you withdraw your consent to the processing and there is no other lawful basis for processing the data.
3. Where you object to the processing and there are no overriding legitimate grounds for continuing the processing (see point 6 below).
4. Where you object to the processing and your personal data are being processed for direct marketing purposes (see point 6 below).
5. Where your personal data have been unlawfully processed.
6. Where your personal data must be erased in order to comply with a legal obligation.
7. Where your personal data have been collected in relation to the offer of information society services (e.g. social media) to a child.

Should such a request be made it must be by letter or email and addressed to the Data Protection Officer (DPO). The following procedure should take place:

- The CEO should be made aware of the request to delete personal information.
- The request for data deletion should be recorded and stored in a central location. At this point, the requestee should be informed that the data deletion process has begun.
- All personal data should be identified, all backup locations/copies should be noted,

and if there is any instance of a 3rd party (data sub-controller or joint controller) having access to the personal data, those parties must be informed of the data deletion request, and the requestor should be informed of who those 3rd parties are.

- The DPO and CEO should make a final determination on whether there is any valid reason to hold on to the personal data in question. Should there not be, the data should be destroyed, and the requestor should be notified in writing that the action has occurred.
 - If there is a valid reason that the personal data should be maintained, the requestor should be notified of the reason/s in writing, and the data should be maintained.
- The whole process should be logged in a central location, and the date that the data is deleted should be recorded. Other important log notes:
 - Each communication (internal within Dyspraxia DCD and with the requestee) should be logged in the file
 - The documentation to the process for data removal
 - Verification that the data was removed
 - Final notification to the requestee that the data was removed.

12.0 Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Dyspraxia/DCD shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the Data Protection Commission within 72 hours of discovery of a breach.

