

# Data Protection Statement – Overview & General Information Revision 1.01 15/02/2024

## **Contact Details**

If you have any questions about this Data Protection Statement or the way in which your Personal Data is being used by us please contact:

Data Protection Officer, The Greenane Centre Ltd., Greenane, Tipperary Town, Co. Tipperary, Ireland E34 CX13

Email: dataprotection@greenane.ie

**Telephone:** +353 62 83730

We are The Greenane Centre Limited (referred to herein as "we", "us", "our" and the "The Greenane Centre").

When we refer to "Personal Data" in this Data Protection Statement we mean any information relating to an identified or identifiable natural person ('Data Subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

## **Our Data Protection Statement**

Under the General Data Protection Regulation (the "GDPR"), we are required to explain to you why we need your Personal Data, how we intend to use it and whether we will share it with anyone else. We must also explain your rights under the GDPR and related data protection law in relation to our processing of your Personal Data. For your convenience we have divided our Data Protection Statement into sections:

#### **Students**

Our <u>Data Protection Statement – Students</u> document provides specific information about the services we provide for applicants and students of our courses of education.



#### **General Contacts**

Our <u>Data Protection Statement – Business Contacts</u> document is relevant to all other individuals whose Personal Data we process who are not considered Students. This includes but is not limited to suppliers, business partners, website users, and members of the public.

We treat the protection of your personal data very seriously and when we collect and process your Personal Data, we will do so in accordance with the GDPR and the Data Protection Acts 1988 – 2018 in Ireland (the "Data Protection Laws").

#### **About Us**

The Greenane Centre is a well-established, award winning training centre specialising in CPD training for Mental Health and Allied Professionals seeking to expand their core training to reflect areas of specialisation. We offer a diverse range of Specialised CPD Programmes underpinned by Trauma Informed Care and the Principals of Best Practices in Mental Health Promotion. All our programmes encompass practical, transferable skills-based training with a strong theoretical foundation underpinned by evidence based and ethical interventions.

This Data Protection Statement describes how we process Personal Data in order to fulfil the objectives specified above. It includes detailed information about the types of Personal Data that we process, and how we use, manage and protect that Personal Data.

## Who This Data Protection Statement Applies To

We process Personal Data about a wide range of people. This general section includes information relevant to all Data Subjects including:

- users of our website;
- individuals identified on our lesson recordings; and
- individuals who receive marketing communications.

We have included further details about our processing activities relating to <u>Students</u> and <u>Business Contacts</u> in specific sections of this Data Protection Statement as follows:

Data Subject	Description
Students	This includes applicants to and students of our courses
Business Contacts	This includes suppliers, partners, facilitators, tutors and other business contacts of The Greenane Centre

#### **Sources of General Contact Personal Data**

We receive Personal Data from a variety of sources, as follows:

- provided as part of the relationship
- may be collected from public sources
- may be collected indirectly from another person
- may be collected through our website
- may be collected through our systems, including CCTV
- may be collected indirectly from a website or from a third party

## **Categories of Personal Data**

We process the following categories of Personal Data. For each category we have included an example of the type of Personal Data that may be part of that category:

Dorochal Data Catagory	Description
Personal Data Category	Description
Identification Data	may include a person's name, photograph, date of birth
Contact Data	may include a person's email address, phone number, postal address, other communication details
Communication Data	may include phone calls, email correspondence and hard copy correspondence
CCTV Data	includes information recorded by our CCTV cameras
Marketing Data	may include your Identification Data, Contact Data and any preferences in receiving marketing from us and your communication preferences
Financial Data	may include payment related information or bank account details and financial data received as part of our relationship with you
Web Data	may include Personal Data provided on any forms on our website, including cookies, and, to the extent that it includes Personal Data, information on the type of device you're using, its IP address, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use

# **Lawfulness of Processing**

We process all Personal Data lawfully and in accordance with the requirements of the law. The GDPR sets out the legal grounds for processing Personal Data.

When we process General Contact Personal Data any one of the following legal grounds will generally apply. If we operate under a legal ground, that is not listed below, we will try to ensure you are informed what that is.

#### Consent

For certain processing activities we may rely on your consent.

Where we are unable to collect consent for a particular processing activity, we will only process the Personal Data if we have another lawful basis for doing so. You can withdraw consent provided by you at any time by contacting us at <a href="mailto:dataprotection@greenane.ie">dataprotection@greenane.ie</a>

#### **Legitimate Interest**

At times we will need to process your Personal Data to pursue our legitimate interests, for example for administrative purposes, to collect debts owing to us, to provide information to you, to operate, evaluate, maintain, develop and improve our websites and services or to maintain their security and protect intellectual property rights.

We will not process your Personal Data on a legitimate interest basis where the impact of the processing on your interests or fundamental rights and freedoms outweigh our legitimate interests. You may object to any processing we undertake on this basis. If you do not want us to process your Personal Data on the basis of our legitimate interests, contact us at <a href="mailto:dataprotection@greenane.ie">dataprotection@greenane.ie</a> and we will review our processing activities.

## **Legal Obligation**

If we have a legal obligation to process Personal Data we will process Personal Data on this legal ground.

## **Defense of Legal Claims**

In limited circumstances and in accordance with the law we may use Personal Data in the defence of legal claims or enforcing legal rights.



# **Our Processing Activities**

The table below sets out the purpose for which we collect General Contact – Personal Data, our lawful basis for doing so, and the Personal Data that we collect. In limited circumstance we may need to use your Personal Data for purposes other than those stated when we collected the Personal Data. Should this happen we will notify you of this new purpose.

Purpose of processing	Categories of personal data	Lawful basis for processing
CCTV		ļ
CCTV Data	<ul> <li>to manage and administer the CCTV system</li> </ul>	<ul><li>Legitimate Interest</li></ul>
Marketing & Promotion Activities		
<ul> <li>to respond to any requests from you</li> <li>to send newsletters and other information that maybe of interest</li> <li>to contact you as part of our relationship and general administration</li> <li>to inform you of events or webinars that might be of interest</li> <li>to deliver and organise our conferences, seminars, events</li> <li>to collect testimonials and promote the King's Inns on our website and other relevant publications, including through</li> </ul>	<ul> <li>Marketing Data</li> <li>Contact Data</li> <li>Web Data</li> </ul>	<ul> <li>Consent</li> <li>Legitimate Interest</li> </ul>
the use of feedback surveys		
Website Delivery		
<ul> <li>to respond to web forms completed by you;</li> <li>to promote our products and services;</li> <li>to administer the Website;</li> <li>and for internal operations, including support, troubleshooting, data analysis, testing, research, statistical and survey purposes</li> </ul>	Web Data	<ul> <li>Consent</li> <li>Legitimate Interest</li> </ul>
to ensure the safety and		

security of our website and our

services

# **Security Of Your Personal Information**

We will take all steps reasonably necessary to ensure that all Personal Data is treated securely in accordance with this Data Protection Statement and the Data Protection Laws. In particular, we have put in place appropriate technical and organisational procedures to safeguard and secure the Personal Data we process.

We monitor for and do everything we can to prevent security breaches of the Personal Data that we process. Once we have received your Personal Data, we will use strict procedures and security features for the purpose of preventing unauthorised access and ensuring that only those who need to have access to your Personal Data can access it.

We also use secure connections to protect Personal Data during its transmission. Where you have been given (or where you have chosen) a password which enables you to access services, you are responsible for keeping this password confidential. Please do not share your password with anyone.

If you think that there has been any loss or unauthorised access to Personal Data of any individual, please let us know immediately.

#### **Disclosure of Personal Data**

We will need to share your Personal Data in order to provide services to you and in certain circumstances we may disclose your Personal Data as follows:

- to business partners and sub-contractors for the performance of any contract relating to services provided by The Greenane Centre
- to tax, audit or other authorities, if we are under a duty to disclose or share
   Personal Data in order to comply with any legal obligation or in order to enforce or apply any contract that we have
- to official authorities to protect our rights, property, or safety, or those of other persons (including you)
- to payment service partners for the processing of payments to and from The Greenane Centre, to screen for fraud and carry out other related activities
- to our catering and events management partners
- to our insurance brokers and providers where required for administering claims
- to our email distribution partners and service providers in the case of marketing and newsletters
- to other academic institutions and partners in the case of marketing and promotions of The Greenane Centre

## **Retention of Your Personal Data**

In some circumstances it is not possible for us to specify in advance the period for which we will retain your Personal Data. In such cases we will determine the appropriate retention period based on balancing your rights against our legitimate interests. We may also retain certain Personal Data beyond the periods specified herein in some circumstances such as where required for the purposes of legal claims.

Our retention policy for General Contact Personal Data is as follows:

Purpose of processing	Retention period
CCTV	30 Days
Website Delivery	Please see our <u>Cookie Notice</u>
Marketing and Promotion Activities	12 months in the case where there is no further meaningful engagement or upon unsubscribe
	5 years in the case of testimonials, feedback, photography and videography provided for the purposes of marketing

Further information is set out in the relevant sections of this Data Protection Statement.

# **Your Rights**

Please see our <u>Data Protection Rights Statement</u> for further information about your rights under Data Protection Law.



## **Use of third Party Websites**

Websites that you access via a link on The Greenane Centre's website are outside our control and are not covered by this Data Protection Statement. If you access other websites using the links provided, the operators of these websites may collect Personal Data from you, which will be used by them in accordance with their own data protection statements, which may differ from ours. Please check the data protection statements on those websites before you submit any Personal Data to them.

#### Cookies

Please see our separate **Cookie Notice** for further information.

#### Amendments to this Data Protection Statement

We will post any changes on the Website and when doing so will change the effective date at the top of this Data Protection Statement.

In some cases, we may provide you with additional notice of changes to this Data Protection Statement, such as via email. We will always provide you with any notice in advance of the changes taking effect where we consider the changes to be material.

## **Queries or Complaints**

Thank you for reading our Data Protection Statement. Please <u>Contact Us</u> if you have any questions. If we are unable to resolve your concerns, you have the right to contact the supervisory authority in the country where you live or work, or where you consider that the data protection rules have been breached.

The Supervisory Authority in Ireland may be contacted as follows:

**Online Form:** <u>forms.dataprotection.ie/contact</u>

Address: 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland

**Tel:** +353 578 684 800 or +353 761 104 800