

## Privacy policy

Roots in Africa-Ireland Network (RIAINetwork) is the data controller in respect of all the personal data collected and processed in relation to your use of our website. We are committed to protecting and respecting your privacy.

### What is collected

Personal data means any information which RIAINetwork has or obtains which you provide to us, such as our name, address, email address, telephone number(s) and date of birth, from which you can be directly or indirectly personally identified. Some of this personal data may be sensitive or special category personal data, such as data concerning ethnicity. The system will log your IP address along with other information provided by your browser. This may include the name and version of the browser you are using, your operating system and any website address that referred you to the RIAINetwork website. This information will only be used for producing anonymous website statistics and will be used to help us with the delivery of the services on the website.

The RIAINetwork website does not store or capture any personal information when someone visits it and is not registered.

However, the system will record personal information if you:

- Provide information by filling in a form on our site;
- Subscribe or register for services that require personal information to be given;
- Report a fault and give your contact details for us to respond;
- Complete surveys that we use for research purposes.

### Cookies

When you visit the RIAINetwork website pages, a small text file called a 'cookie', is downloaded onto your computer. This is called a session cookie. This will only remain on your computer until you close your browser. This cookie is not used to identify you personally in any way. We will use this type of cookie to collect aggregated website statistics that allow us to understand how visitors use the site. All of the information collected will be anonymous and only used to help us improve the website and report to funders on usage.

A persistent cookie will be downloaded when you first visit the site. These remain in your browser's cookie store between sessions. This type of cookie will allow us to identify repeat visitors to the site. Persistent cookies are also used to allow registered users to use the site without logging in on every visit.

**You may opt to view the site without cookies by adjusting your browser's settings.** If you do disable cookies some functions of the site may no longer work correctly.

For more information on cookies see the [All About Cookies website](#).

### What we will do with your information

Any information that is collected by RIAINetwork from this website will only be used for monitoring purposes unless you have given us consent for your information to be used, for example, if you have provided us with your email address so we can contact you, if you have registered as a regular site user, if you have registered for an event so that we can get back to you. We may, from time to time, send you relevant information about RIAINetwork and its work, although there will be an option for you to opt out of this at the registration stage.

We will ensure that all personal information supplied is held securely, in accordance with the complies with the requirements of the relevant Irish legislation, namely the General Data Protection Regulation (GDPR) 2018, the Irish Data Protection Act (1988), and the Irish Data Protection (Amendment) Act (2003). The data controller is RIAINetwork. If you have any queries regarding this, please contact us **(please insert hyperlink: [info@riainetwork.com](mailto:info@riainetwork.com))**

## **Your rights**

From May 2018 you have enhanced rights over how your personal data is held, processed and stored, and RIAINetwork is committed to upholding and meeting these. They include the requirements that data be:

- Processed lawfully, fairly and in a transparent manner;
- Collected for specified, explicit and legitimate purposes;
- Adequate, relevant and limited to what is necessary;
- Accurate and, where necessary, kept up-to-date;
- Retained only for as long as necessary;
- Processed in an appropriate manner to maintain security.

**You also have the right to lodge a complaint about the processing of your personal data by RIAINetwork with the Data Protection Commission, the process which is set out on the Data Protection commission's website [www.dataprotection.ie](http://www.dataprotection.ie).**

## **Access to information**

If you have any queries in relation to how your personal data is used by RIAINetwork, please contact us at [info@riainetwork.com](mailto:info@riainetwork.com). Any formal, written request by a Data Subject for a copy of their personal data (a Subject Access Request) will be referred, as soon as possible, to the Data Protection Officer, and will be processed as soon as possible.

It is intended that by complying with these guidelines, RIAINetwork will adhere to best practice regarding the applicable Data Protection legislation

## **Children's Privacy**

In accordance to the Child Care act 1991 and Children First Act 2015, Riainetwork does not work with children under 18 without the consent of their guardian. We do not knowingly collect personally identifiable information for any person under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with personal contact us [info@riainetwork.com](mailto:info@riainetwork.com). If we become aware that we have collected personal data from anyone under the age of 18 without verification of parental consent, we take steps to remove that information from our servers.

## **Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email.

The information on this page was last reviewed on **[please insert date of launch of website]**

## **Roots in Africa-Ireland Data Protection Policy**

## Introduction

This Data Protection Policy (“the **Policy**”) applies to the officers, directors, employees, and subcontractors of RIAINetwork. It provides a concise policy statement regarding the Data Protection obligations of RIAINetwork. This includes obligations in dealing with personal data, in order to ensure that the organisation complies with the requirements of the relevant Irish legislation, namely the General Data Protection Regulation (GDPR) 2018, the Irish Data Protection Act (1988), and the Irish Data Protection (Amendment) Act (2003).

## Rationale

RIAINetwork 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 RIAINetwork in relation to its staff, service providers, agents, customers, suppliers and clients (“**data subjects**”) in the course of its activities. RIAINetwork makes no distinction between the rights of Data Subjects who are employees, and those who are not. All are treated equally under this Policy.

This Policy must be read in conjunction with the Privacy Policy and any other applicable policies that may be communicated to you from time to time.

The policy covers both personal and sensitive personal data held in relation to data subjects by RIAINetwork. The policy applies equally to personal data held in manual and automated form.

All Personal and Sensitive Personal Data will be treated with equal care by RIAINetwork. Both categories will be equally referred-to as Personal Data in this policy, unless specifically stated otherwise.

## RIAINetwork as a Data Controller

In the course of its daily organisational activities, RIAINetwork acquires, processes and stores personal data in relation to:

- Employees of RIAINetwork
- Customers of RIAINetwork
- Third party service providers engaged by RIAINetwork

In accordance with the Irish Data Protection legislation, this data must be acquired and managed fairly. Not all staff members will be expected to be experts in Data Protection legislation. However, RIAINetwork is committed to ensuring that its staff have sufficient awareness of the legislation in order to be able to anticipate and identify a Data Protection issue, should one arise. In such circumstances, staff must ensure that the Data Protection Officer is informed, and in order that appropriate corrective action is taken.

Due to the nature of the services provided by RIAINetwork, there is regular and active exchange of personal data between RIAINetwork and its Data Subjects. In addition, RIAINetwork exchanges personal data with Data Processors on the Data Subjects’ behalf.

This is consistent with RIAINetwork’s obligations under the terms of its contract with its Data Processors.

This policy provides the guidelines for this exchange of information, as well as the procedure to follow in the event that a RIAINetwork staff member is unsure whether such data can be disclosed.

In general terms, the staff member should consult with the Data Protection Officer to seek clarification.

## **Processing in line with the data subject's rights**

The rights of data subjects include:

- the right of access
- the right to rectification
- the right to erasure
- the right to restriction of processing
- the right to data portability
- the right to object.

In order for data subjects to exercise their rights, they must make a request to the company. Any formal, written request by a Data Subject for a copy of their personal data (a Subject Access Request) will be referred, as soon as possible, to the Data Protection Officer, and will be processed as soon as possible.

It is intended that by complying with these guidelines, RIAINetwork will adhere to best practice regarding the applicable Data Protection legislation.

### Third-Party processors

In the course of its role as Data Controller, RIAINetwork engages a number of Data Processors to process Personal Data on its behalf. In each case, a formal, written contract is in place with the Processor, outlining their obligations in relation to the Personal Data, the specific purpose or purposes for which they are engaged, and the understanding that they will process the data in compliance with the Irish Data Protection legislation.

These Data Processors include:

- MailChimp
- Google – GSuite
- **[please insert any other processors that have been added]**

## **The Data Protection Principles**

The following key principles are enshrined in the Irish legislation and are fundamental to the RIAINetwork's Data Protection policy.

In its capacity as Data Controller, RIAINetwork ensures that all data shall:

1. Be obtained and processed fairly and lawfully.

For data to be obtained fairly, the data subject will, at the time the data are being collected, be made aware of:

- The identity of the Data Controller (RIAINetwork);
- The purpose(s) for which the data is being collected;
- The person(s) to whom the data may be disclosed by the Data Controller;
- Any other information that is necessary so that the processing may be fair.

RIAINetwork will meet this obligation in the following way.

- Where possible, the informed consent of the Data Subject will be sought before their data is processed;
  - Where it is not possible to seek consent, RIAINetwork will ensure that collection of the data is justified under one of the other lawful processing conditions – legal obligation, contractual necessity, etc.;
  - Where RIAINetwork intends to record activity on CCTV or video, a Fair Processing Notice will be posted in full view;
  - Processing of the personal data will be carried out only as part of RIAINetwork’s lawful activities, and RIAINetwork will safeguard the rights and freedoms of the Data Subject;
  - The Data Subject’s data will not be disclosed to a third party other than to a party contracted to RIAINetwork and operating on its behalf.
2. Be obtained only for one or more specified, legitimate purposes.

RIAINetwork will obtain data for purposes which are specific, lawful and clearly stated. A Data Subject will have the right to question the purpose(s) for which RIAINetwork holds their data, and RIAINetwork will be able to clearly state that purpose or purposes.

3. Not be further processed in a manner incompatible with the specified purpose(s).

Any use of the data by RIAINetwork will be compatible with the purposes for which the data was acquired.

4. Be kept safe and secure.

RIAINetwork will employ high standards of security in order to protect the personal data under its care. Appropriate security measures will be taken to protect against unauthorised access to, or alteration, destruction or disclosure of any personal data held by RIAINetwork in its capacity as Data Controller.

Access to and management of staff and customer records is limited to those staff members who have appropriate authorisation and password access.

5. Be kept accurate, complete and up-to-date where necessary.

RIAINetwork will:

- ensure that administrative and IT validation processes are in place to conduct regular assessments of data accuracy;
- conduct periodic reviews and audits to ensure that relevant data is kept accurate and up-to-date.
- conduct regular assessments in order to establish the need to keep certain Personal Data.

6. Be adequate, relevant and not excessive in relation to the purpose(s) for which the data were collected and processed.

RIAINetwork will ensure that the data it processes in relation to Data Subjects are relevant to the purposes for which those data are collected. Data which are not relevant to such processing will not be acquired or maintained.

7. Not be kept for longer than is necessary to satisfy the specified purpose(s).

Once the respective retention period has elapsed, RIAINetwork undertakes to destroy, erase or otherwise put this data beyond use.

8. Be managed and stored in such a manner that, in the event a Data Subject submits a valid Subject Access Request seeking a copy of their Personal Data, this data can be readily retrieved and provided to them.

RIAINetwork has implemented a Subject Access Request procedure by which to manage such requests in an efficient and timely manner, within the timelines stipulated in the legislation.

### **Data Subject Access Requests**

As part of the day-to-day operation of the organisation, RIAINetwork's staff engage in active and regular exchanges of information with Data Subjects. Where a formal request is submitted by a Data Subject in relation to the data held by RIAINetwork, such a request gives rise to access rights in favour of the Data Subject.

RIAINetwork's staff will ensure that, where necessary, such requests are forwarded to the Data Protection Officer in a timely manner, and they are processed as quickly and efficiently as possible, but within not more than 40 days from receipt of the request.

### **Implementation**

As a Data Controller, RIAINetwork ensures that any entity which processes Personal Data on its behalf (a Data Processor) does so in a manner compliant with the Data Protection legislation.

Failure of a Data Processor to manage RIAINetwork's data in a compliant manner will be viewed as a breach of contract and will be pursued through the courts.

Failure of RIAINetwork's staff to process Personal Data in compliance with this policy may result in disciplinary proceedings.

### **Definitions**

For the avoidance of doubt, and for consistency in terminology, the following definitions will apply within this Policy.

### **Data**

This includes both automated and manual data.

Automated data means data held on a computer or stored with the intention that it is processed on the computer.

Manual data means data that is processed as part of a relevant filing system, or which is stored with the intention that it forms part of a relevant filing system.

### **Personal Data**

Information which relates to a living individual, who can be identified either directly from that data, or indirectly in conjunction with other data which is likely to come into the legitimate possession of the Data Controller. (If in doubt, RIAINetwork refers to the definition issued by the Article 29 Working Party, and updated from time to time.)

### **Sensitive Personal Data**

A particular category of Personal data, relating to: Racial or Ethnic Origin, Political Opinions, Religious, Ideological or Philosophical beliefs, Trade Union membership, Information relating to mental or physical health, information in relation to one's Sexual Orientation, information in relation to commission of a crime and information relating to conviction for a criminal offence.

### **Data Controller**

A person or entity who, either alone or with others, controls the content and use of Personal Data by determining the purposes and means by which that Personal Data is processed.

### **Data Subject**

A living individual who is the subject of the Personal Data, i.e. to whom the data relates either directly or indirectly.

### **Data Processor**

A person or entity who processes Personal Data on behalf of a Data Controller on the basis of a formal, written contract, but who is not an employee of the Data Controller, processing such Data in the course of his/her employment.

### **Processing**

Any operation or set of operations which is performed on personal data, whether or not by automated means. This includes storing the personal data, disclosing the data to third parties, and other activities (Such as collection, recording, alteration, retrieval, use, restriction, erasure or destruction).

### **Data Protection Officer**

A person appointed by RIAINetwork to monitor compliance with the appropriate Data Protection legislation, to deal with Subject Access Requests, and to respond to Data Protection queries from staff members and service recipients.

### **Relevant Filing System**

Any set of information in relation to living individuals which is not processed by means of equipment operating automatically (computers), and that is structured, either by reference to individuals, or by reference to criteria relating to individuals, in such a manner that specific information relating to an individual is readily retrievable.

### **Changes to this Policy**

RIAINetwork reserves the right to update this Policy at any time. RIAINetwork will distribute a new policy in a timely manner before making any substantial updates.

**Contact Us- Remains the same as the one currently on prototype**