



## **Safe Routes to School Privacy Statement**

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*Effective from September 2021*

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## INTRODUCTION

### About this statement and how to read it

The purpose of this document is to provide information to you about the use of your personal data by Safe Routes to School, a program of An Taisce's Environmental Education Unit.

To read An Taisce EEU's Data Protection Policy, please [click here](#).

At Safe Routes to School ("**SRTS**" or "**we**"), we respect your right to privacy and we handle your personal data in accordance with our obligations under Data protection legislation which comprises of- the General Data Protection Regulation (No 2016/679/EU) ("**GDPR**") which came into force on 25 May 2018, Privacy and Electronic Communications Directive 2002/58/EC ("**Directive**") and other relevant law as will be updated when required and Data Protection Act, 2018 ("**the Act**") (together "**Data Protection Legislation**").

This document outlines what personal data we, as data controller, collect and process in our dealings with you, how and why we process those personal data and what your rights are in respect of your personal data.

The statement has been written to provide you with clear and transparent information in an easy-to-understand format. To help with this, the statement is split into three sections:

- (i) PART A "SPECIFIC INFORMATION": This contains different sections for each type of individual whose personal data we process, with each section providing information on how we process personal data specifically belonging to that type of individual. So to understand how we process your personal data, go to the section(s) that relates to you.
- (ii) PART B "GENERAL INFORMATION": This contains information about processing that is relevant to ALL individuals.
- (iii) PART C "YOUR RIGHTS": This contains information about your rights under Data Protection Legislation.

### Contact

If you have any questions about our privacy statement, your rights, or how we use your information, please do not hesitate to contact us here at **Safe Routes to School**:

Safe Routes to School

Post: 5A Swift's Alley, The Liberties, Dublin, D08 TN88

Email: [saferoutestoschool@greenschoolsireland.org](mailto:saferoutestoschool@greenschoolsireland.org)

Phone: 01 400 2202

### Changes to this statement

We will update this Privacy Statement from time to time, as the programme develops and our data-gathering requirements evolve.

## PART A: SPECIFIC PROCESSING INFORMATION

### 1. RESOURCE SURVEYS

Where you participate in a survey as a student or parent under the Safe Routes to School program, this section relates to you.

#### 1.1. How we collect your personal data

We collect your personal data:

- Directly from you. Example includes when you submit a response via a link to an online survey.

#### 1.2. The personal data we use

We process and use personal data included in the webform. This includes:

- IDENTITY - including School, Gender, Class group, Age group;
- CONTACT - including your Address, Town, Postal Code, Email
- LOCATION - the location area in which you live

#### 1.3. The purpose and legal basis for processing your personal data

We will only process your personal data where it is lawful and necessary to do so. Your personal data are processed:

- To identify travel habits across gender, class group and location
- To perform spatial analysis, evaluation and summarisation of data submitted
- For our legitimate interests to understand the improvements in the programme;
- To manage our everyday business needs in line with our legitimate interests, such as risk management, accounting, business continuity, complaint management, troubleshooting, technical support, protection of our assets and information, and to establish, exercise and safeguard our rights.

#### 1.4. Who we share your personal data with

We do not share your personal data with third parties unless it is necessary. Sharing occurs with a limited set of individuals and organisations and in limited circumstances. Examples of when sharing may occur and the third parties to whom we share your personal data are as follows:

- To third parties who are providing services to us to enable us to manage the relationship with you, including our consultants, our software providers (e.g. email and file storage) and our IT support provider
- To statutory, regulatory, government or law enforcement bodies as required by law.

### 1.5. Consequences of not giving your data to us

You are not under any obligation to provide your personal data to us. However, we do need some personal data in order to understand the effectiveness of our programmes and failure to provide this information may result into inaccuracy of the said survey.

### 1.6. How long we keep your personal data for

Personal data is kept in a form, which permits data subject identification only for as long as is permitted while following fair and lawful processing. No personal data will be kept for a period longer than necessary.

Data submitted to us will be retained for no longer than 5 years, from the date of submission.

## **PART B: GENERAL PROCESSING INFORMATION**

### **1. How we keep your personal data safe**

Appropriate security measures are implemented in order to protect your personal data. Security measures refer to physical security in the office (e.g. securely locked filing cabinets etc.) as well as implementing appropriate technology and cyber security measures across our systems and networks in order to prevent any accidental or unauthorised access, interference, damage, loss or disclosure of personal data. Security measures also refer to organisational measures implemented in order to safeguard the rights and freedoms of the data subject (e.g. staff education, DPO, privacy champions, limited data access, periodic checks to ensure that your security measures remain appropriate and up to date etc.)

In the event of certain types of personal data breaches, we are legally obliged to notify the Data Protection Commission and affected individuals to whom the personal data belong. We have implemented internal procedures to manage personal data security breaches in accordance with our legal obligations.

### **2. Transfers outside the European Economic Area**

In connection with the above purposes, we occasionally, and only where necessary, transfer your personal data to third parties outside the European Economic Area (“EEA”). If and to the extent that we do so, we will ensure that appropriate measures are in place to comply with our obligations under applicable law governing such transfers, which may include:

- (i) to a jurisdiction which has been subject to an “Adequacy” decision from the European Commission, meaning the jurisdiction is recognised as providing for an equivalent level of protection for personal data as is provided for in the European Union;
- (ii) entering into a contract governing the transfer which contains the “standard contractual clauses” approved for this purpose by the European Commission; or

- (iii) in respect of transfers to the United States of America, ensuring that the transfer is covered by the Standard Contractual Clauses

## PART C: YOUR RIGHTS

You have a number of rights in respect to your personal data. These are:

- (i) The right to **access** your personal data, which includes receiving confirmation on whether the personal data are being processed and if so, receiving the personal data and related information about why they are being processed, the categories of personal data involved, to whom the personal data have been or will be shared and how long the data will be kept for. We will accede to any such valid requests within one month of the receipt of a valid request in writing
- (ii) The right to request that we **rectify** inaccurate data or update incomplete data. You may also request that we restrict the processing of the personal data until the rectification or updating has been completed, although please be aware that we may have to suspend the operation of your account or the products or services that we provide.
- (iii) The right to request that we **erase** your data under certain circumstances, including where you want to withdraw the consent you previously gave to us, where you object to SRTS processing the data for its own legitimate interests or where SRTS processing of the data is unlawful. In the case of unlawful processing, you can also request that this processing is restricted rather than the personal data being erased. Please be aware that we may have to suspend the operation of your account or the products or services that we provide where data processing is restricted.
- (iv) The right to **object** to the processing of your personal data, where such processing is being conducted for the purpose of:
  - a. Direct marketing;
  - b. Establishing, exercising or defending ourselves or others from legal claims; or
  - c. Our legitimate interests, unless we can demonstrate that our interests override your interests and rights. You may request that we restrict the processing of the personal data until this analysis of legitimate interests has been concluded, although please be aware that we may have to suspend the operation of your account or the products or services that we provide where data processing is restricted.
- (v) The right to receive your data in a **portable** format or, subject to it being technically feasible, have us transfer it directly to a third party. This applies where you have provided us with consent for the processing or where the processing is necessary for entering a contract with us.
- (vi) The right, at any time, to **withdraw consent** you have provided to us to process your personal data.

- (vii) The right to **lodge a complaint** to the Data Protection Commission or another supervisory authority. The Office of the Data Protection Commission can be contacted at:

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|-----------------|---|
| Email:          | <a href="mailto:info@dataprotection.ie">info@dataprotection.ie</a>          |
| Telephone:      | +353 (0)761 104 800   |
| Postal Address: | Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28 |

If you wish to raise a complaint in relation to how we processed your personal data, please contact us. We take your privacy and data protection very seriously at the Safe Routes to School programme and we endeavour to address your complaint as expediently and as thoroughly as we can, in order to find a satisfactory resolution for you.

*End of Document*