

Privacy Statement for Students (and Their Parents/Guardians)

1 INTRODUCTION

This Privacy Statement provides information about who we are, what personal data we collect about you (or your child), why we collect it, who we share it with, why we share it, how long we keep it, and your/your child's rights.

We are the Professional Development Service for Teachers ("PDST", "us", "we" or "our"). Our address is 14 Joyce Way, Park West Business Park, Nangor Road Dublin 12, our email is info@pdst.ie. PDST is a cross-sectoral support service under the remit of the Teacher Education Section of the Department of Education and Skills (DES) and is managed out of Dublin West Education Centre ("DWEC").

PDST works on behalf of the Department of Education and Skills and offers professional learning opportunities to teachers and school leaders in a range of pedagogical, curricular and educational areas. We are committed to protecting and respecting your privacy. This Privacy Statement sets out the basis on which we collect personal data about you/your child or that you provide to us.

2 IDENTITY OF THE CONTROLLER OF PERSONAL INFORMATION

For the purposes of Data Protection Legislation, the Data Controller is PDST, a national body registered with the Data Protection Commission (Registered Number REF 13590/A) and having its registered office address at 14 Joyce Way, Park West Business Park, Nangor Road Dublin 12.

3 CONTACT DETAILS OF THE DATA COMPLIANCE OFFICER

The data compliance officer appointed can be contacted – please see "Contact Us" for further contact information.

4 WHEN DOES THIS PRIVACY NOTICE APPLY

This Notice applies to personal information that we collect, use and otherwise process about you/ your child in connection with your relationship with us.

5 THE TYPES OF DATA WE PROCESS

Personal data refers to information that identifies or could identify an individual. It does not include personal data where the identity has been removed (i.e. anonymous data).

We may collect or ask you to provide the following types of personal data:

- i. **personal information:** you/your child's name, contact information;
- ii. **digital images:** images or videos recorded in order to promote PDST programmes; and
- iii. **communication records:** we may keep a record of information that you provide by filling in forms, if you contact us we may keep a copy of that correspondence.

In the event you have any concerns about the guidelines set forth in this Privacy Statement, please contact us at privacy@pdst.ie.

6 WHY DO WE COLLECT YOUR/YOUR CHILD'S PERSONAL DATA

We will hold, process and may disclose personal data for the following purposes:

Personal data	Purpose(s) for processing	Legal basis for processing
Personal information (name, school, age), Digital images, videos Communication records.	To promote and support PDST programmes use in primary and post primary schools.	Consent

We may request your explicit consent to process (specific types of) personal data. In these circumstances, you are able to withdraw your consent at any time by following the instructions provided when you gave consent or at the contact details below.

7 SHARING PERSONAL DATA

7.1 PDST organisation

Your/your child's personal data will only be shared with the wider PDST organisation and its educational partners in certain circumstances and where lawful to do so. PDST's wider organisation includes the Professional Development Service for Teachers, Technology in Education ("PDST TIE") and DWEC.

7.2 Service Providers

We use third party service providers who provide services [including IT, PR, media services¹]. In providing the services, your/your child's personal data will, where applicable, be processed by the service provider on our behalf.

We will check any third party that we use to ensure that they can provide sufficient guarantees regarding the confidentiality and security of your/your child's personal data. We will have written contracts with them which provide assurances regarding the protections that they will give to your/your child's personal data and their compliance with our data security standards and international transfer restrictions.

7.3 Personal data will be shared with the production company involved in recording.

7.4 Disclosures to Third Parties

In certain circumstances, we share and/or are obliged to share your personal data with third parties, for the purposes described above and in accordance with Data Protection Legislation.

These third parties include but are not limited to:

- i. Department of Education and Skills;
- ii. Department of Children and Youth Affairs;
- iii. Department of Justice and Equality; or
- iv. Department of Communications, Climate Action and Environment
- v. Department of Culture, Heritage and the Gaeltacht

7.5 Third country data transfers

We do not transfer your personal data to a third country or international organisation.

¹ **Eversheds Sutherland Comment:** Please amend as appropriate.

8 AUTOMATED DECISION MAKING/PROFILING

We do not engage in automated decision making/profiling.

9 HOW LONG DO WE RETAIN YOUR/YOUR CHILD'S PERSONAL DATA FOR?

We will only store your personal data for as long as necessary for the purpose(s) for which it was obtained.

10 HOW IS MY PERSONAL DATA SECURED

10.1 PDST operates and uses appropriate technical and physical security measures to protect your/your child's personal data.

10.2 We have in particular taken appropriate security measures to protect your/your child's personal data from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access. Access is only granted on a need-to-know basis to those people whose roles require them to process your/your child's personal data. In addition, our service providers are also selected carefully and required to use appropriate protective measures.

11 YOUR/YOUR CHILD'S RIGHTS

You have several rights in relation to your personal data, which may be subject to certain limitations and restrictions. These rights are to:

- access a copy of the personal data we hold about you;
- have us correct any inaccurate personal data about you and complete any personal data that is incomplete;
- erasure of your personal data, (this right does not apply for example, where the processing is necessary to comply with a legal obligation or for the establishment, exercise or defence of legal claims);
- request a copy of your personal data in a portable format;
- request a restriction of the processing of your personal data;
- withdraw your consent, we process your personal data on the legal basis of consent, you are entitled to withdraw your consent at any time (the withdrawal of your consent will not invalidate any processing we carried out prior to your withdrawal and based on your consent);
- not to be subjected to decisions based solely on automated processing, including profiling, which produce legal effects concerning you or similarly significantly affects you; and
- to object to the processing of your personal data where we are processing your personal data in reliance on our legitimate interests (in such a case we will stop processing your personal data unless we can demonstrate compelling legitimate grounds which override your interests and you have a right to request information on the balancing test we have carried out).

If you wish to exercise any of these rights, please contact us (see Contact Us below). We may request proof of identification to verify your request.

12 YOUR RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

Without prejudice to any other administrative or judicial remedy you might have, you may have the right under data protection legislation in your country (where applicable) to lodge a complaint with the relevant data protection supervisory authority in your country (i.e. the Office of the Data Protection Commissioner in Ireland) if you consider that we have infringed applicable data protection legislation when processing your personal data. This means the country where you are habitually resident, where you work or where the alleged infringement took place. The Irish Data Protection Authority contact details are:

Data Protection Commission

Telephone: +353 (0)761 104 800 or Lo Call Number 1890 252 231

E-mail: info@dataprotection.ie

For further information please visit www.dataprotection.ie

Access to information and correction

You may request copies of your personal data held by us as a controller. We will provide you with a copy of the personal data held by us as soon as practicable and in any event not more than one month after the request in writing is received by us. We will provide you with the copy free of charge but please note that we reserve the right to charge a reasonable administrative fee where further copies are requested or the request is manifestly unfounded or excessive. We may also request proof of identification to verify your access request. All access requests should be addressed to the data compliance officer, at the address in our contact details.

At any time, you may object to the processing of your personal data by us and may block specific uses of your personal data by contacting us using the contact details below.

13 CHANGES TO OUR PRIVACY STATEMENT

We reserve the right to change this Privacy Notice at any time in our sole discretion. If we make changes, we will provide an update via our website and update "last dated" (see below), so that you can see what information we gather, how we might use that information and in what circumstances we may disclose it. By continuing to use our services after we post any such changes, you accept and agree to this Privacy Notice as modified.

14 CONTACT US

Questions, comments and requests regarding this Privacy Statement and your personal data are welcome and should be addressed to us at the below email and/or postal address:

Email: privacy@pdst.ie

Address: 14 Joyce Way,
Park West Business Park,
Nangor Road
Dublin 12

Last updated: [January 2020]