



## Data Protection Policy

<b>Effective From</b>	7th October, 2019
<b>Review Date</b>	5 <sup>th</sup> October 2020

### Definitions

<b>Charity</b>	TOUCH Foundation Limited, Registered Charity.
<b>GDPR</b>	Means: General Data Protection Regulation.
<b>Responsible Persons</b>	Means: Directors Pauline McHugh, Seamus Gleeson and Desmond Mulhere
<b>Approved By</b>	Board Members: Gretta Duffy and Paul Cryan

### Policy:

To ensure that all personal data under the control of TOUCH Ireland Foundation is stored, processed and used in compliance with the Irish data Protection Acts 1988 & 2003, EU Data Protection Directive 1995 & The General Data Protection Regulation 2018.

### Policy Statement:

TOUCH Ireland embraces its obligation to protect individual's rights to privacy & confidentiality by adopting best practice in relation to the effective handling of personal information.

### 1. Data Protection Principles:

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

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.”

## **2. General provisions:**

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Persons shall take responsibility for the Charity’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually, at the AGM of TOUCH Foundation Limited.

## **3. Lawful, Fair and Transparent processing:**

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a System of Data Retention, which System shall be reviewed at least annually.
- b. Individuals have the right to access their personal data and any such requests made to the Charity shall be dealt with in a timely manner.

## **4. Lawful purposes:**

- a. All data processed by the Charity must be done pursuant to the lawful aims of the Charity and processed on the lawful bases of consent, contract, or legal obligation..
- b. Where consent is relied upon as a lawful basis for processing data, evidence of such consent shall be kept with the personal data.
- c. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity’s Data retention systems.

## **5. Data minimisation:**

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. In particular the Charity shall ensure all personal data relating to charitable donations and consequential revenue applications shall be processed only as is necessary for the purposes of

proper record and account of said donations, and proper processing of revenue transactions relating to the Charity.

**6. Accuracy:**

- a. The Charity shall take reasonable steps to ensure personal data is accurate.

**7. Archiving / Removal:**

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving system that requires that every 5 years personal data and records are reviewed and only necessary data or records retained. When personal data is required to be deleted, pursuant to the archive review or otherwise, this should be done safely such that the data is irrecoverable.

**8. Security:**

- b. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- c. Access to personal data shall be limited to Board Members of the Charity who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- d. When personal data is deleted this should be done safely such that the data is irrecoverable.
- e. Appropriate back-up and disaster recovery solutions shall be in place.

**9. 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, the Charity shall promptly assess the risk and act promptly to protect the rights of the persons whose data was subjected to the breach.

Approved by the Board of TOUCH Ireland , Registered Charity on the 7th of October, 2019.