

## Turas Abhaile/Solas Advisory Data Controller Policy

Effective Date: 1/01/2023 Last Reviewed: 1/09/2024

### 1. Introduction

Turas Abhaile is committed to protecting the privacy and personal data of our clients, candidates, employees, and partners. This Data Controller Policy outlines how we collect, use, store, and protect personal data in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

### 2. Definitions

- Personal Data: Any information relating to an identified or identifiable natural person.
- Processing: Any operation performed on personal data, including collection, storage, use, and disclosure.
- Data Subject: An individual whose personal data is being processed.
- Data Controller: The entity that determines the purposes and means of processing personal data.

### 3. Data Controller Details

Data Controller: Solas Advisory/Turas Abhaile

Rannyhual, Kincasslagh, Co Donegal, Ireland. Contact Information:

Email: [applications@turasabhaile.com](mailto:applications@turasabhaile.com) Phone: 087 936 6667 Data Protection Officer (DPO):

John Gorman Email: [info@turasabhile.com](mailto:info@turasabhile.com)

### 4. Types of Personal Data Collected

We may collect and process the following categories of personal data:

- Candidates: Name, contact details, CV/resume, educational background, professional qualifications, employment history, references, and any other information relevant to recruitment.
- Clients: Organization details, contact information, recruitment requirements, and contractual information.
- Employees: Personal identification details, employment contracts, payroll information, performance records, and other HR-related data.
- Website Visitors: IP addresses, browser types, access times, and browsing behavior through cookies and similar technologies.

### 5. Purpose of Processing

We process personal data for the following purposes:

- Recruitment: To match candidates with suitable teaching positions.
- Client Management: To manage relationships with schools, educational institutions, and other clients.
- Employment Administration: To manage employee records, payroll, and HR functions.
- Marketing: To send newsletters, promotional materials, and updates (with consent).
- Compliance: To comply with legal obligations and protect our legal interests.

### 6. Legal Basis for Processing

We process personal data based on the following legal grounds:

- Consent: Where the individual has given explicit consent for specific purposes.
- Contractual Necessity: To fulfill contracts with candidates, clients, or employees.
- Legal Obligation: To comply with legal and regulatory requirements.

- Legitimate Interests: For business purposes, provided they do not override the individual's rights and freedoms.

## 7. Data Sharing and Disclosure

We may share personal data with:

- Clients and Educational Institutions: To facilitate recruitment processes.
- Service Providers: Third-party vendors who provide services such as IT support, payroll processing, and marketing (subject to data processing agreements).
- Legal Authorities: When required by law or to protect our legal rights.

We ensure that all third parties comply with GDPR and relevant data protection laws.

## 8. Data Retention

We retain personal data only for as long as necessary to fulfill the purposes outlined in this policy unless a longer retention period is required or permitted by law. Specific retention periods are as follows:

- Candidates: 6 years after the last interaction.
- Clients: 6 years after the end of the business relationship.
- Employees: Duration of employment plus 6 years.
- Website Data: As required for operational purposes or as per legal obligations.

## 9. Data Subject Rights

Individuals have the following rights regarding their personal data:

- Right to Access: Request access to their personal data.
- Right to Rectification: Request correction of inaccurate or incomplete data.
- Right to Erasure: Request deletion of personal data under certain conditions.
- Right to Restrict Processing: Request limitation of data processing.
- Right to Data Portability: Receive their data in a structured, commonly used format.
- Right to Object: Object to data processing based on legitimate interests or direct marketing.
- Right to Withdraw Consent: Withdraw consent at any time where processing is based on consent.

Requests can be made by contacting our Data Protection Officer at [info@turasabhile.com](mailto:info@turasabhile.com). We will respond within one month.

## 10. Data Security

We implement appropriate technical and organizational measures to protect personal data against unauthorized access, loss, or destruction. These measures include:

- Access Controls: Restricting access to personal data to authorized personnel only.
- Encryption: Encrypting sensitive data during transmission and storage.
- Regular Audits: Conducting periodic security assessments and audits.
- Training: Providing data protection training to employees.

## 11. Data Breach Procedures

In the event of a data breach, we will:

1. Identify and Contain: Immediately identify the breach and contain its impact.
2. Assess Risk: Evaluate the risk to individuals' rights and freedoms.
3. Notify Authorities: Report the breach to the Data Protection Commission (DPC) within 72 hours if required.
4. Inform Affected Individuals: Notify affected data subjects without undue delay if the breach poses a high risk to their rights and freedoms.

5. Mitigate Effects: Take steps to mitigate the effects of the breach and prevent future occurrences.

#### 12. International Data Transfers

If we transfer personal data outside the European Economic Area (EEA), we ensure that appropriate safeguards are in place, such as:

- Adequacy Decisions: Transferring data to countries recognized by the European Commission as providing adequate data protection.
- Standard Contractual Clauses: Implementing standard contractual terms approved by the European Commission.
- Binding Corporate Rules: Applying internal policies for intra-group transfers.

#### 13. Third-Party Links

Our website and services may contain links to third-party websites. We are not responsible for the privacy practices or content of these external sites. We encourage users to review the privacy policies of any third-party sites they visit.

#### 14. Changes to This Policy

We may update this Data Controller Policy from time to time to reflect changes in our practices or legal requirements. We will notify users of significant changes by updating the effective date and, where appropriate, providing additional notice.

#### 15. Contact Us

If you have any questions or concerns about this policy or our data processing practices, please contact our Data Protection Officer:

Data Protection Officer: John Gorman Email: [info@turasabhile.com](mailto:info@turasabhile.com)

Phone: 087 936 6667