

Guide to Understanding

DANAI DATA PROTECTION AND RETENTION POLICY

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Section 1

1. SCOPE OF THE POLICY

This policy applies to the Dermatology and Aesthetic Nurses Association of Ireland (hereafter referred to as DANAI). The policy sets out the requirements that the DANAI has in order to gather personal information for professional purposes. The policy details how personal information will be gathered, stored and managed in line with data protection principles and the General Data Protection Regulation. The policy is reviewed on an ongoing basis to ensure that it is compliant. This policy should be read in tandem with DANAI's Privacy Policy.

2. WHY THIS POLICY EXISTS?

This data protection policy ensures that DANAI:

- Complies with data protection law and follows good practice.
- Protects the rights of users.
- Remains open about how data is stored and processed.
- DANAI is protected from the risks of a data breach.

3. DATA PROTECTION PRINCIPLES

The General Data Protection Regulation (GDPR) identifies 8 data protection principles.

1. Personal data shall be processed lawfully, fairly and in a transparent manner
2. Personal data can only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. The collection of personal data must be adequate, relevant and limited to what is necessary compared to the purpose(s) data is collected for.
4. Personal data held should be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that are inaccurate are erased or rectified without delay.
5. Personal data which is kept in a form which permits identification of individuals shall not be kept for longer than is necessary.
6. Personal data must be processed in accordance with the individuals' rights.

7. Personal data must be 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 BAHRsasures.
8. Personal data cannot be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the rights and freedoms of individuals in relation to the processing of personal data.

Certain of these principles are expanded upon in the sections that follow.

4. LAWFUL, FAIR AND TRANSPARENT DATA PROCESSING

1. DANAI requests personal information for the purposes of administering membership, collecting subscription fees, renewal of membership, running events and disseminating newsletters.
2. The forms used to request personal information may contain a privacy statement outlining why the information is being requested and what the information will be used for. Users will be asked to provide consent for their data to be held and a record of this consent will be securely held. Users will be informed that they can, at any time, remove their consent and will be informed as to what to do should they wish to do so.

5. PROCESSED FOR SPECIFIES, EXPLICIT AND LEGITIMATE PURPOSES

1. Users will be informed how their information will be used and DANAI will seek to ensure that Users' information is not used inappropriately. Appropriate use of information provided by patients includes administering membership, collecting subscription fees, renewal of membership, running events, disseminating newsletters

DANAI will ensure that User information is managed in such a way as to not infringe an individual members rights which include:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure

- The right to restrict processing
- The right to data portability
- The right to object.

6. ADEQUATE, RELEVANT AND LIMITED DATA PROCESSING

The DANAI users will only be asked to provide information that is relevant to support administering membership, collecting subscription fees, renewal of membership, running events, disseminating newsletters. This includes:

- Name
- Email address
- Telephone number

Where additional information may be required, this will be obtained with the specific consent of the patient who will be informed as to why this information is required and the purpose for which it will be used.

7. ACCURACY OF DATA AND KEEPING DATA UP TO DATE

DANAI has a responsibility to ensure that user information is kept up to date. Users will be required to let DANAI know if any of their personal information changes.

8. ACCOUNTABILITY AND GOVERNANCE

DANAI is responsible for ensuring that their practice remains compliant with data protection requirements and can provide evidence that it has. For this purpose, those from whom data is required will be asked to provide written consent. The evidence of this consent will then be securely held as evidence of compliance.

Section 2

9. SECURE PROCESSING

DANAI has a responsibility to ensure that data is both securely held and processed.

This includes:

- using strong passwords for information held within computer systems
- restricting access to computer and cloud-based files
- using password protection on laptops and PCs that contain or access personal information
- using password protection or secure cloud systems
- providing adequate virus-protection and firewall software to secure computer-based systems.

10. SUBJECT ACCESS REQUEST

The DANAI users are entitled to request access to the information that is held. The request needs to be received in the form of a written request to DANAI at info@danai.ie

Upon receipt of the request, the request will be formally acknowledged and dealt with within 14 days unless there are exceptional circumstances as to why the request cannot be granted. DANAI will provide a written response detailing all information held on the User. A record shall be kept of the date of the request and the date of the response.

11. DATA BREACH NOTIFICATION

Were a data breach to occur, action shall be taken to minimise the harm. DANAI will inform any User where the personal information has been compromised. Where necessary, the Information Commissioner's Office will be notified.

If a User contacts DANAI to say that they feel that there has been a breach by DANAI, the User will be asked to provide an outline of their concerns. If the initial contact is by telephone, DANAI will ask the User to follow this up with an email or a letter detailing their concern. The concern will then be investigated fully and a response made to the User. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

12. DATA RETENTION

Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

In accordance with the fifth data protection principle, DANAI commits to:

- not keep personal data for longer than is necessary for the purpose or those purposes that we hold the information;
- securely delete information that is no longer needed for this purpose or these purposes; and
- update, archive or securely delete information if it goes out of date.