



Data Protection and Privacy Policy

Introduction

Prudence College Dublin (PCD) is a private academic institute registered in Ireland and an initiative of Green Sustainability International Ltd. The College (and its online platform PCDonline) is firmly grounded in a belief that recognizes the importance of education systems that are conducive to knowledge transfer, learning and innovation that are focused on achieving the best outcomes for its students. The College consists of four schools: (i) Business and Management, (ii) Coding and Computing, (iii) Applied Sciences and Technology, and (iv) Languages and Culture.

It is committed to the delivery of world-class professional and academic teaching and learning programmes and courses using both traditional (**Face-to-Face**) and **Virtual** (Interactive – Real Time - Distance Learning) classroom methodologies, as well as **Online** through its online platform “PCDonline”. The College has four academic terms/sessions: Spring, Summer, Summer+ and Autumn with classes commencing in January, April, July and September, respectively.

The vision of PCD is to achieve recognition as an academic centre of excellence in higher education in Europe by attracting diverse spectrum of high-calibre and deserving students from home and abroad through the provision of advanced education and training opportunities to satisfy present and future global needs.

The College is committed to protecting the rights and privacy of staff, students, and other individuals (e.g. parents and members of the advisory board) in accordance with both European Union and Irish data protection legislation. It will lawfully and fairly collect and process personal data about employees, students, contractors/sub-contractors and other individuals/entities in order to contribute to its mission and functions.

It rigidly enforces the data protection legislation that upholds the rights of individuals and ensures the responsibilities of College staff in processing personal data are adhered to. Accordingly, this policy document sets out the ways in which the College will process personal data and ensure that staff understand the rules governing their use of personal data over the course of their work.

The EU General Data Protection Regulation (GDPR EU 2016/679) enforced from the 25th May 2018 and thereby replacing the Data Protection Directive 95/46/EC, was implemented to protect and empower all EU citizens' data privacy and to reshape the way organizations across the region approach data privacy this is the basis for the College policy, which has been adopted by College staff. This is a working document that may be modified in order to cope with changes resulting from any legislative or jurisprudential modifications.

Scope

The data protection policy covers the maintenance and processing of personal data, both in manual form and on computer, including personal data held on both staff, students, parents/guardians, board of advisors, contractors/sub-contractors and any individuals/entities who can access or use personal data in their work for the College. This policy also applies to all locations from which College personal data is accessed, including home use. However, this should not be construed as a contractual undertaking. The College reserves the right to review and amend this from time to time without notice.

Data: refers to the information in a form which can be processed. It includes automated data (electronic/digital) and manual data through or as part of relevant filing systems.

Relevant filing system: refers to any set of information that, while not computerised, is structured by reference to individuals, or by reference to criteria relating to individuals, so that specific information relating to a particular individual is readily accessible.

Personal data: refers to data relating to a living individual who is or can be identified from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller/handler. It includes information such as identification numbers, location data and online identifiers.



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Data Controller: A data controller/handler is the individual or legal entity which controls the contents and use of personal data. The College can be considered to be the data controller, including the president/CEO in line with policies to be formulated by the advisory board in exercising the functions involved.

Rationale

The College is obliged by the law in Ireland to comply with the Data Protection Act, 1988 and the Data Protection (Amendment) Act, 2003 (hereafter referred to as the Data Protection Acts), and the EU GDPR (<https://gdpr-info.eu/>) and any updates/modifications to be considered from time to time. These include:

- the [Education Act, 1998](#), where the parents of a student, or a student who has reached the age of 18 years, will be given access to records kept by the College relating to the progress of the student in his or her education.
- the [Education \(Welfare\) Act, 2000](#), the College will maintain a register of all students attending the school, record the attendance or non-attendance of students registered at the school on each school day, and may supply personal data kept in the College, or information extracted from such data, to the data controller of another prescribed body if she/he is satisfied that it will be used for a “relevant purpose” only.

The College will follow the data protection policy in order to ensure data privacy rights, which are available on: www.dataprotection.ie.

Mission and Vision

This policy is formulated to safeguard data protection rights by ensuring compliance through guidance, supervision, and enforcement to recognise the College as an internationally respected Institution in compliance with data protection laws. That the College demonstrates professionalism, competence, and expertise in performing an implementation role under the GDPR in accordance with Irish and EU law. That it also upholds values, such as fairness, expertise, collaboration, transparency, and accountability in providing education and training, in line with statutory and regulatory bodies, and other stakeholders.

The College seeks to enable each student to develop his/her full potential, and can benefit from various supports, such as any relevant additional teaching or financial aid, religious education, or emergency communication with parent/guardians, while providing a safe and secure environment for learning in compliance with legislative or administrative requirements. The main purpose for keeping records of staff, members of the advisory board, and others associated with the College is mainly for administrative, financial management and marketing. It will also uphold the diversity of values, beliefs, traditions, languages, and ways of life in society, providing equal opportunity, and ensuring fair judgement for all.

Goals

The main goals/objectives are to: (i) ensure that the College complies with the Data Protection Acts/GDPR applicable for a private College, (ii) ensure compliance with the relevant EU and Irish rules of data protection, and (iii) ensure that the data protection rights of students, staff, board members and other members/individuals/entities working for the College are protected.

Key measures to collect data

Depending on the types of individuals as stated above, the personal data records are stored mainly in the form of electronic/digital database but also to maintain manual records of personal files within the filing system where applicable. The following data listed under various categories below are collected and held by the College:



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Staff: (i) Name, address and contact details, PPS number; (ii) Original records of application and appointment; (iii) Record of appointments to promotion posts; (iii) Details of approved absences (career breaks, parental leave, study leave, sickness etc.), (iv) Details of work record (qualifications, classes taught, subjects etc), and (vi) Details of complaints and/or grievances including consultations or competency discussions, action/improvement /evaluation plans and a record of progress.

Student: (i) Name, address and contact details, PPS number; (ii) Names and addresses of parents/guardians and their contact details; (iii) Religious belief, racial, ethnic or national origin; (iv) Membership of the Traveller community, where relevant, and any relevant special conditions (e.g. special educational needs, health issues etc.) which may apply; (v) Information on previous academic record, psychological assessments, and attendance records, (vi) Academic record - subjects studied, class assignments, examination results as recorded on official College reports, (vii) Records of significant achievements, records of disciplinary issues and/or sanctions imposed and other records, such as records of any serious injuries/accidents and similar.

Advisory Board: (i) Name, address and contact details; (ii) Records in relation to appointments to the board; and (iii) Minutes of board meetings and correspondence to the board which may include references to particular individuals.

Other Records: Other records including the parents/guardians of the existing registered and potential students, contractors/sub-contractors and other service providers for administrative, student affairs and financial matters/issues associated with the College.

Compliance arrangements

The College has several arrangements in place to ensure that all personal data records held are obtained, processed, used and retained in accordance with the Data Protection Acts i.e. (i) to obtain and process information fairly, (ii) maintained only for one or more specified, explicit and lawful purpose, (iii) used and disclosed only in ways compatible with these purposes, (iv) it is kept safe and secure, (v) it is accurate, complete and up-to-date, (vi) that its adequacy, relevance and appropriateness is ensured, (vii) retained for no longer than is necessary for the purpose or purposes, and (viii) that a copy of his/her personal data can be provided to the individual on request. For additional details, [A Guide for Data Controllers](#), should be consulted.

For the minimum age at which consent can be legitimately obtained for processing and disclosure of personal data, the guidance material published on the Data Protection Commissioner's website should be consulted: <https://www.dataprotection.ie/>. However, as a rule in education, "a student aged eighteen or older may give consent themselves". A student aged from twelve up to and including seventeen should give consent themselves and, in addition, consent should also be obtained from the student's parent or guardian." Importantly, Appendix 1 will be included on relevant forms in collecting personal information.

To protect everyone associated with the College and its activities, the College ensures Privacy Policy in relation to the personal data and the data are processed currently by the College Administration (admin@prudencecollege.ie) in association with Admissions, Marketing and ICT teams.

For providing efficient and associated on-time services to students and the others stated above, the College collects all legitimate personal data through website, social media, emails and other media from users having contractual right. The College reserves the right of not responding to or processing requests that do not include the requested personal data. An option will remain in place to review and update personal data by the providers and the College staff from time to time. The purposes and legal basis of processing and holding personal data is as follows:

1. **Contract form:** This is used to contact the College for information or suggestions, and replies to any queries that arise, as well as sending information on education and training-related products, information (ads/commercial) services and activities of various communication/social media. In most cases, corresponding terms of agreement/consents are provided so that the College can respond legitimately. The processing may also be legitimized based on the pre-contractual or contractual relationship that may exist between the applicant and the College.



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2. *Application form for profiling:* The main purpose of this is to send a preliminary evaluation of student's profile based on the personal data provided including ads and commercial materials by various means and the services to be offered as indicated above. A pre-contractual or contractual relationship between the College administration and the students may also exist, and the consent given for providing the College services and products. For students, registers and roll books are maintained (manual and electronic) and stored.
3. *Downloading prospectus/brochure:* This includes details of the programmes and courses of its own and/or through partnerships offering by the College that is downloaded with an intention to study/enrol. A minimum of personal information (name, email, tel, origin, etc.) is collected to provide the services offering and relevant information on other products and activities by any communication means. This results in the given consent to send consumers the information including prospectus/brochure requested, and other materials/service indicated above for legitimate processing on the basis of the pre-contractual or contractual relationship that may exist between the consumer and the College.
4. *Following social media, website and subscription to blogs and other publications:* The above policies apply to the followers of social media (Facebook, Twitter, LinkedIn, etc), other electronic means (Tel, WhatsApp, Messenger, email, etc.) and subscribers to blogs and other publications. Through these, the College obtains consent to formalize any engagement, and to send relevant advertising and commercial information. The College also collects data for example IP Addresses and information relating to browsing mainly linked to the College activities through its website to manage and optimize the website legitimately while preserving the security and integrity of the website. The associated Privacy and Cookie policies can be consulted at <https://www.dataprotection.ie/>.
5. *Events subscription:* The main purpose is to formalize the client's registration and participation in the selected event including ads and commercial materials as above.
6. *Sports, Clubs & activities registration:* By registering with sports team, clubs and other activities where the College directly/indirectly involved in, students formalize their registration and participation in the selected activities. This may result in a consent given us to send communications about the College products, services, and activities by any means.
7. *Application for employment opportunities:* When seeking a job opportunity, the College collect personal, professional, and other relevant information through application form and CV to complete personnel selection processes. By which the applicant gives us legitimate consent to participate in the hiring processes that results the pre-contractual or contractual relationship between the applicant and the College. Once employed, the College keeps related data includes pay, taxation, and other related personnel service records as per rules and regulations exist in Ireland and the EU.
8. *Registration for donations:* As a registered donor, the College takes consent to formalize the registration as a donor, and to send communications about products, services and activities by any means. This results in the legitimate pre-contractual or contractual relationship between the two parties for the above services to provide.

Duration of holding data

The length of time that personal data is kept depends on the duration of the individual/entity's (students, suppliers and others indicated above) relationship with the College and the periods established by law. Explicitly, the College keeps personal data for indicated purposes only if absolutely necessary until revoked by corresponding consent or the end of the period required to comply with legal obligations. For hiring processes, personal data are kept for a year and so after the end of the selection process, or once the administration has received the applicant's CV. Afterwards, the College administration deletes the data and takes any necessary steps to complete any obligations derived from that relationship. The College registers and roll books are kept indefinitely within the College in compliance with any amendments required as per the Data Protection Acts and may destroy these if the deposition of



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completed registers and roll books are no longer required for administrative purposes with the Local Authority Archive Service.

The personal data collected are protected responsibly and correctly in compliance with the contractual or pre-contractual relationship, and other legal obligations exist in Ireland and the EU. The College takes all technical and organizational measures necessary to prevent the processing and visualization of personal data other than for legitimate obligations to disclose it, for instance, to judges and courts, the Public Prosecutor's Office or the competent Public Administration, data protection authorities, etc. For any future potential litigation (e.g. accidents/personal injuries involving College personnel/students or accidents occurring on College property), the relevant records are retained until the possibility of litigation ceases, in general from 2 to 6 years.

Rights to exercise on personal data

There are a range of rights under GDPR to exercise and the key elements are:

Right of access: requests for confirmation of processing personal data and access to the data and certain legally stipulated information. Students aged 18 and over are entitled to access their personal information in accordance with the Data Protection Acts. Action is taken promptly and within 40 days of receiving the request and for examinations data, within 60 days or 60 days of first publication of the results, whichever is the later.

Right to rectification: requests for the rectification of incorrect or incomplete personal data, which will be done within a fortnight after receiving the request.

Right to erasure: requests for the erasure of personal data no longer necessary for the purposes for which it was collected, which is handled within 40 days of the request being made.

Right to restriction of processing: requests for a restriction of processing of personal data in certain circumstances that excludes, for example, the conservation purposes with due consent; establishment, exercise, or defence of legal claims; protection of the rights of another natural or legal person or important public interest at a national or EU level.

Right to data portability: requests to receive personal data concerning the provider for the data's direct transmission to a new controller under certain circumstances.

Right to object: objections to the processing of personal data except for legitimate and imperative reasons that prevail over the interests, rights, and freedoms of the provider, or for the formulation, exercise or defence of possible claims.

Revoke: request a revoke of consent provided but does not condition, in any case, the execution of the contract signed, or the relations generated previously.

Complaint: submission of a complaint to the supervisory authority after failing to get responses within one month of its submission.

For more information, please consult: <https://www.dataprotection.ie/en>

For exercising rights, please contact the College Administration with your proof of identity and relevant information details (e.g. dates, times and locations) at admin@prudenceCollege.ie.

Other Policies and Curriculum Delivery

It is particularly important to notify the College immediately at admin@prudencecollege.ie in the event of a data breach. Following the GDPR, the College authority will identify the nature of the breach and notify the Data Protection Commissioner as and where applicable. For College staff, the line manager is the first contact point to take such an action.

For more information on Privacy and Cookie Policies, please consult: <https://dataprotection.ie/en/>



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Currently, the College does not operate CCTV of its own and this is done by the ACE Enterprise Park for the safety and security of its premises, and this is equally applicable for students and staff of the College.

For information on data protection and privacy with Office 365, the following links can be visited:

- [Information about where your data is stored](#)
- [Information on Office 365's privacy policy](#)
- [Information on Office 365 Regulatory Compliance](#)
- [Information on Office 365 Trust Centre](#)

Policy implementation and relevant arrangements

The policy will be implemented, monitored, reviewed, and evaluated by the CEO/President of the College in cooperation with the admissions office and the ICT staff responsible for registering, recording, and entering the information on a regular basis. A copy of the policy and other relevant information will be provided to all staff and students either electronically through email and/or post on the College website.

Appendix 1

The following Data Protection Statement will be included on relevant forms when personal information is being requested.

The information collected on this form will be held by Prudence College Dublin in manual and in electronic format. The information will be processed in accordance with the Data Protection Act, 1988 and the Data Protection (Amendment) Act, 2003.

The purpose of holding this information is for *administrative purposes/to facilitate the College in meeting the student's educational needs/ any other issues relevant to operation and commercial purposes.*

Disclosure of any of this information to statutory bodies such as the Department of Education and Science or its agencies will take place only in accordance with legislation or regulatory requirements. Explicit consent will be sought from Parents/Guardians or students aged 18 or over if the school wishes to disclose this information to a third party for any other reason.

Parents/Guardians of students and students aged 18 or over have a right to access the personal data held on them by the school and to correct it if necessary.

I consent to the use of the information supplied as described.

Signed Parent/Guardian: _____

Signed Student: _____