



Thrombosis Ireland CLG 8 Data Protection Policy

Objective: The Objective of this policy is to describe the actions Thrombosis Ireland is taking to adhere to GDPR.

Definitions

- **GDPR** means the General Data Protection Regulation.
- **DPC** means the Irish Data Protection Commission.
- **Responsible Person** means the individual member of the Thrombosis Ireland Board who has been assigned data protection responsibility within the Charity.
- **Register of Systems** means a register of all systems or contexts in which personal data is processed by the Thrombosis Ireland.

1. Data Protection Principles

Thrombosis Ireland CLG (TI) 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 collected, stored, and/or processed by Thrombosis Ireland.
- b) The Responsible Person shall take responsibility for Thrombosis Ireland's ongoing compliance with this policy.
- c) This policy shall be reviewed at least annually.
- d) Thrombosis Ireland shall register with the Information Commissioner's Office as an organisation that processes personal data.

3. Lawful, Fair and Transparent Processing

- a) To ensure its processing of data is lawful, fair and transparent, Thrombosis Ireland shall maintain a Register of Systems. While not required under GDPR (Article 30 - Records of processing activities) due to the size of the organisation, this will help ensure the integrity, security, and auditability of all data held.
- b) Register of Systems will define what data processing/storage systems are used by Thrombosis Ireland, and what personally identifiable information (PII) is stored in each system.
- c) The Register of Systems shall be stored on Thrombosis Ireland's secure storage (Microsoft Teams) with appropriate access controls.
- d) The Register of Systems shall be maintained by the Responsible Person and reviewed at least annually.

4. Lawful Purposes

- a) All data processed by Thrombosis Ireland must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests (see DPC guidance for more information at: <https://www.dataprotection.ie/>).
- b) Thrombosis Ireland shall note the appropriate lawful basis in the Register of Systems.
- c) Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d) 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 Thrombosis Ireland's systems.

5. Data Minimisation

- a) Thrombosis Ireland 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) Thrombosis Ireland's primary use of PII is for contact lists of sponsors, supporters, practitioners, volunteers, and the public requesting information.
- c) All data collect, stored, and processed will be assessed for lawfulness of processing (Article 6) on annual basis. Any data not required will be deleted.
- d) All data held by Thrombosis Ireland will be audited for consent (Article 7) on an annual (or more frequent) basis. Consent will consist of a demonstrable agreement by the data subject to the use of the data for specified purposes.
- e) Thrombosis Ireland will not collect, store, or process data on children (Article 8)
- f) Thrombosis Ireland will not collect, store, or process special categories of personal data (Article 9): with the exception patient stories, which will be explicitly consented to by the data subjects.

6. Accuracy

- a) Thrombosis Ireland shall take reasonable steps to ensure personal data is accurate.
- b) Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Rights of Access

- a) Individuals have the right to access their personal data (Article 15 - Right of access by the data subject) and any such requests made to the charity shall be dealt with in a timely manner but no later than 21 days from receipt of request.
- b) Any request for access will be directed to the Responsible Person for logging and action.

8. Security

- a) Thrombosis Ireland shall ensure that personal data is stored securely using software and systems that are kept-up-to-date as per Technology policy.
- b) Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c) When personal data is deleted this should be done safely such that the data is irrecoverable.
- d) Appropriate back-up and disaster recovery solutions is 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, Thrombosis Ireland shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the DPC (more information on the DPC website <https://www.dataprotection.ie/>).

References

www.dataprotection.ie

Related Documents

- a. Register of Systems

Document History

Draft written September 2020

To be adopted by the board January 2021

Review

This policy will be reviewed at least once every year.

Annemarie O'Neill, Founder	Mel Duignan, Chairman / Treasurer (until role filled)	Lauren Carey, Company Secretary
Karen Collins	Ann O'Sullivan	Garrett Brennan
Barbara Wiseman	Gordon Stewart	Brian Carberry
William Morrin	Noel Carberry	Guvanch Meredov
	Deirdre Kelly	Stephen Dowdall Treasurer