

St. Columba's College Foundation – Privacy Statement

1. Introduction

This privacy statement provides information on how the St. Columba's College Foundation (the **Foundation**) uses personal data for the further development of St. Columba's College (the **College**), including for the principal purpose of actively engaging with individuals within the College and wider community to enable the development and maintenance of a lasting, life-long relationship with the College.

The mission of the Foundation is:

- To engage with the College's worldwide community (including current and former parents, alumni, pupils, staff, Friends of the College and donors)
 - To build awareness of College activities and developments, both ongoing and planned.
 - To identify and engage with prospective donors.
2. This statement should be read alongside other relevant privacy documentation that has been published by the College, for example, the College's [Data Protection Policy](#). It should also be noted that all activities within the College that depend upon the collection and use of personal data, take place under the formal control of the Board of Management of the College.

3. Why does the Foundation need to process personal data?

The future development of the College is reliant on support from the wider community. Without this generous support such development would not be possible.

The purposes for which the Foundation uses personal data are as follows:

- Maintaining a record of the Foundation's relationship with members of its community, donors and prospective donors.
- Sending publications (e.g. newsletters, development updates, etc.)
- Fundraising (including mail, email and telephone appeals)
- Administrative purposes such as routine financial management and administration by the Foundation including issuing receipts for donations, database update enquiries, processing tax relief for donations received, and addressing donation requirements determined by the Revenue Commissioners, the Charities Regulator and HMRC etc.
- Research in order to improve the Foundation's understanding of our community, supporters and alumni, inform our fundraising strategy and target our communications more effectively.

If you are concerned about how your personal data is processed by the Foundation, please refer to the 'Contact Us' section below.

4. Legal bases for using your information

Whenever the Foundation is engaged in processing personal data we ensure that each processing activity relies upon an appropriate lawful basis. This means that one or more of the following will apply:

- (i) Processing is necessary for compliance with a legal obligation to which the Foundation is subject under Article 6(1)(c) GDPR.
- (ii) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of the official authority vested in the Foundation under Article 6(1)(b) GDPR.
- (iii) Processing is necessary for the purposes of the legitimate interests pursued by the Foundation under Article 6(1)(f) GDPR, provided such interests are not overridden by your interests and rights – you have the right to object at any time.
- (iv) You have given your consent to processing for one or more specific purposes under Article 6(1)(a) GDPR.

5. Why does the Foundation collect your personal data?

Should you choose to provide your personal data to the Foundation, the Foundation will:

- (i) Collect personal information (name, relationship with other members of the College community) for the upkeep of the Foundation's records. Contact details (address, email address, telephone number) help us to keep our community up to date on news from the Foundation, upcoming events and activities including fundraising (Article 6(1)(a) and 6(1)(f) GDPR).
- (ii) Store photographs from the College archive and those taken at Foundation events to be used in the Foundation's communications to publicise the work of the Foundation (Article 6(1)(f) GDPR).
- (iii) Store donation/financial information (donation amount, date, purpose/restriction, regular payment details) for the maintenance of accurate financial records for the Foundation, and to comply with Charities Regulator and Revenue Commissioners and HMRC guidelines (Article 6(1)(c) GDPR).
- (iv) The Foundation will keep details of school events attended, correspondence and communication preferences to help us communicate with our College community (Article 6(1)(a) and 6(1)(f) GDPR).
- (v) The Foundation may keep details of interests and hobbies of the College community to help us create events and communications which appeal to the Foundation community (e.g. interest in philanthropy and volunteering, golf events) (Article 6(1)(f) GDPR).

6. How the Foundation collects and secures data and how long the Foundation retains it

The Foundation is committed to protecting the security of your Personal Data. The Foundation uses a variety of security technologies and procedures to help protect your Personal Data from unauthorised access and use.

The period for which the Foundation retains your personal information is determined by the specific purpose for which the personal data is being processed. This means that the Foundation must delete your personal data if it is no longer required to serve a particular purpose. The Foundation will also delete your personal data if you ask the Foundation to do so (and there is no other legal basis that

requires the Foundation to retain that personal data). The retention periods are set out in the College's *Record Retention Policy* ([see here](#)).

7. Who has access to your personal data

Personal data collected by the Foundation will remain within the Foundation's systems and will be accessed and processed by authorised individuals only.

Under certain, very limited, circumstances the Foundation may need to share your data (including your personal data) with third parties. In each case there will always be a legal basis underlying any such sharing.

For example, the Foundation's accountants may access some personal data when they audit the Foundation accounts. Similarly, the Revenue Commissioners may require some sharing of personal data when confirming the validity of charitable donations. Every data controller who requires access, however limited, to some of the personal data processed by the Foundation is bound by the terms of the relevant Data Protection legislation.

In other examples, some of the Foundation processing of personal data may require support from specialist service providers. For example, the Foundation may use remote IT back-up and restore services to maintain data security and integrity. The Foundation may also avail of third-party services in:

- Communicating by email e.g. newsletters
- Using online payments systems to make online donations.
- Managing the Foundation's activity by using a Management Information Systems.
- Using consultants and advisors.
- Event management/marketing

8. In cases such as these, where the Foundation use third party data processors, the Foundation will always ensure appropriate safeguards are in place to protect your data privacy through for example, ensuring that the appropriate security guarantees have been provided and that there is a signed processing agreement in place.

9. Your rights

Personal data provided to the Foundation will be processed in line with the rights of individuals as data subjects and these rights are as follows:

- The right to have personal information processed in a concise, transparent, intelligible and easily accessible form, using clear and plain language.
- The right to be informed, this means that the Foundation needs to tell you what data we are using, why we are using it and for what purpose as well as informing you of the details of any third parties in receipt of data from the Foundation.
- The right of access, you are allowed to see what data of yours we are processing if you request that from us.
- The right of rectification, that means if the data we are using is incorrect we have to correct it.
- The right to be forgotten, this means that we do not keep the data for a period longer than is necessary for the reason that it was originally collected. It also means that you

have the right to issue a request to us requesting the erasure of your personal data. However, in many cases, the Foundation will have overriding legitimate grounds for continued processing and will be unable to comply with such a request. This will be handled on a case-by-case basis.

- Where processing is based on consent, the right to withdraw your consent to the processing of your data by the Foundation. This will not affect the lawfulness of processing based on consent before its withdrawal.
- The right to restrict processing, this means that you can ask us to stop using your data unless the Foundation has a legitimate lawful purpose for continuing to do so.
- The right to data portability, this means that you have the right to move your data that you originally provided to the Foundation to another data controller/processor and the Foundation has to provide you with this data in an acceptable format; and
- The right to object, this means that you can object to the use of your data by the Foundation and the Foundation must stop using it unless it has an overriding legitimate reason to continue.

10. It should be noted that you also have the right to lodge a complaint with the Office of the Data Protection Commissioner where you feel that an infringement of Data Protection Laws has taken place. For more information, please see 'Contact Us' below.

Contact Us

If you are concerned about how your personal data is processed by the Foundation, please do not hesitate to bring these concerns to our attention using the contact details below:

*The Warden,
St. Columba's College,
Whitechurch,
Dublin 16
D16 CH92*

Phone: +353 (0) 1 490 6791

Email: warden@stcolumbas.ie

You can also refer to the website of the Irish Data Protection Commission.
<https://www.dataprotection.ie/>