

## Business in the Community Ireland - Privacy Statement

### Introduction

Business in the Community Ireland (BITCI) is a registered charity, established in 2000, whose mission is to harness the power of Irish business to maximise its positive impact on all its stakeholders and society. For more information see [www.BITCI.ie](http://www.BITCI.ie).

This document explains how we collect and use your data and also explains your rights under the **General Data Protection Regulation (GDPR)**.

### Why we need to collect our data

The main objectives of BITCI are

1. Assist companies, large and small, to engage in Corporate Social Responsibility (CSR) and sustainability
2. Helping organisations to measure, report and communicate on corporate social responsibility and sustainability
3. Run the Business Working Responsibly Mark, an NSAI standard based on ISO 2600
4. Operate innovative social inclusion programmes under Business Action on Education and Employment.

In meeting our objectives under 1, 2 and 3 above, we collect and process personal data on individuals who act as our point of contact within those companies with whom we engage.

Where a company has signed up to one of our membership streams we process this data to meet our **contractual obligations** to that company.

As one of the main aims of BITCI is to promote engagement by companies in CSR and Sustainability activities we proactively seek out and engage with prospective member companies and the individuals who represent those companies.

For these non-member companies we believe we have a **legitimate interest** to process this data.

For our employment and education programmes we collect and process personal data on clients and volunteers who participate in these programmes.

Where we process the data of clients and volunteers, we do so with their **consent** as outlined in the relevant programme application form.

## How we obtain your data

Much of the data we collect has been provided directly to us by you.

Occasionally, we may collect data from publicly available sources, typically news articles and online social media.

We may also collect data from referrals i.e. where someone else may provide your contact details to us in the belief that you may be interested in CSR and/or sustainability.

In the case of clients and volunteers of our social inclusion programmes, we will only collect data that has been provided directly to us by you.

## How we use your data

### Member/non-member companies – points of contact

We collect and process your data in order that we can do some or all of the following

- Provide you with the services outlined in your membership agreement
- Generally communicate with you regarding our CSR and Sustainability activities, including specific CSR and Sustainability events taking place whether hosted by BITCI or other organisations.

Typically, the information we process will include some or all of the following

- Your contact details i.e. name, address, email and phone details
- General information regarding your occupations, professional activity and networks
- Your preferences regarding how you wish us to maintain contact with you
- Your specific CSR and Sustainability interests
- Records of your transactions (donations, fees) with us
- Information regarding our relationship with you including correspondence, meeting notes and attendance at events organised by BITCI.

At all times we strive to only process information that we feel is appropriate and relevant given the nature of your relationship with us.

## Programme clients and volunteers

### Clients

We collect and process your data in order that we can communicate with you, understand your needs and support you as your progress through our programmes.

Typically, the information we process will include some or all of the following

- Your contact details i.e. name, address, email and phone details
- Any other data necessary for the assessment of your application, noting that this may include sensitive personal data.
- Information regarding our relationship with you including correspondence and meeting notes.

## Volunteers

We collect and process your data so that we can communicate with you as you participate in our programmes. For some of our programmes, where volunteers will be working with children, we are required by law to ensure volunteers are vetted by the National Vetting Bureau.

Typically, the information we process will include some or all of the following

- Your contact details i.e. name, address, email and phone details
- Information regarding our relationship with you including correspondence and meeting notes.

If the programme for which you are volunteering requires vetting then, in addition to the information required by the National Vetting Bureau (NVB), we will be required to process the disclosures from the NVB which may, where relevant, include details of unspent criminal convictions. We will also be required to share this information with a specified person within the partner organisation (typically a school principal) involved in the programme.

## How we protect your data

### Keeping your data secure

For member and non-member company contacts, we keep your data secure in our primary database with appropriate security mechanisms in place. Our primary database is located on our premises and access is controlled by user ID and password settings.

The database in question is a widely respected and trusted product in use globally by many organisations, large and small. We have a detailed contract with the supplier and we will take all reasonable steps to ensure that they provide an adequate level of protection in accordance with GDPR.

For our Education Programmes all participant and volunteer's data, including data relating to any vetting, is held in secure storage. Only nominated staff can access to this data.

For our Ready for Work employment programmes, client data is stored on a shared database which is administered by a separate organisation, BITC (UK). This data is only accessible by BITC staff here

in Ireland who work directly for the Ready for Work programme and by nominated systems support staff within BITC (UK) for the specific purpose of routine system maintenance.

Other employment programme client data is held in secure storage. Only nominated staff can access to this data.

## Sharing your data

We do not share your personal data with anyone else or any other organisation unless it is necessary for the purpose for which you have given us the data.

In specific cases where we have your authority to do so, we will share your data with others

- For certain employment programmes, where we set up a work placement for a participant, your employment programme application details may be shared with the placement company but only with your prior approval.
- Where volunteers of our education programmes are required to submit an application to the National Vetting Bureau we will share the disclosure of your vetting with a nominated person (normally the principal) of the participating school.

## How long we keep your data

We will retain your data for as long as is needed to complete the purpose for which it was originally processed. However, in certain circumstances we will be required by our law, and/or by the terms of our programme funding, to retain your data for a longer period of time.

In general, so long as we maintain an ongoing relationship with you, in whatever form, we will continue to retain your data.

For member and non-member company contacts, where our relationship with you has ceased we will retain your data for a further period of 2 years.

For our employment programmes, we will retain all records for a period of 7 years after the completion of the programme.

For volunteers of our education programmes we will retain your data, including any data relating to a vetting disclosure, for 3 years following the completion of your involvement with the programme.

At any point you may request details of this data and you may also request us to delete this data. Notwithstanding that we may be required by law to retain some or all of your data, in practical terms we will seek to respond to your request by either suppressing or anonymising your data.

Suppressing your data within our database in effect 'archives' your data. Not only does this ensure that we will not actively process your data, it also ensures that we do not inadvertently re-add you to our 'active' database against your wishes.

In circumstances where your data includes financial transactions e.g. membership fees, donations, anonymising your data allows us to keep a record of that transaction (your name and fee/donation amount) while effectively deleting all other data we hold.

## Your Rights

Under GDPR you have a number of rights in respect of your data and how we process it.

- Where our use of your data requires consent, you may withdraw your consent at any time.
- Where we rely on Legitimate Interest to process your data, you may ask us to stop doing so.
- You may request a copy of the data we hold for you.
- You may change or stop the manner in which we communicate with you or process data about you and, if it is not required for the purpose you provided it, then we will do so. Examples of where we may continue to process your data might include an obligation on us arising from our membership agreement with you or an obligation on us arising from the conditions of our (employment/education) programme funding
- If you are not satisfied with the way we have processed your data we would like to hear from you directly so that we may address your concerns. However, at any time you have the right to complain directly to the Data Protection Commissioner.

## Complaints

If you have any questions or concerns regarding this privacy notice, about the manner in which we process your data or you wish to update how we process your data e.g. your communication preferences, you can contact us in a number of ways

- by email at [info@BITCI.ie](mailto:info@BITCI.ie);
- by phone at +353 1 874 7232
- by post at **Finance Manager, 3<sup>rd</sup> Floor, Phibsborough Tower, Phibsborough, Dublin D07 XH2D**