

Data Protection and Privacy Policy

This policy is pending ratification by BITCI's Board Nov 2024

Policy no.	Gov
Owner	SLT
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Approved by, date	Audit and Risk Committee,
Ratified by, date	BITCI Board,

Purpose

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

Scope

This policy applies to personal data related to employees, volunteers, interns, board members, contractors, agency workers, members of administrative, management or supervisory bodies working for or on behalf of BITCI and job applicants. In addition the policy applies to those individuals engaged in our education and employment programmes and employees in our member companies.

Why we need to collect our data

The main objectives of BITCI are:

1. Support members to progress their sustainability agendas spanning all aspects of Economic, Environmental, Social and Governance (EESG), so their business model is future-proofed
2. Convene, upskill, and facilitate networking of sustainability practitioners and CEOs so they can be more proactive in ensuring their business becomes more sustainable
3. Help create inclusive workplaces by supporting vulnerable job seekers in their employment opportunities and championing collective campaigns with members on diversity profiling
4. Enhance the educational outcomes and employment opportunities of DEIS pupils through pairing local businesses with schools to deliver range of school-based initiatives.

In meeting our objectives, 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 memberships 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 participants and volunteers who participate in these programmes.

Where we process the data of participants 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, including our employment and education programmes.

In the case of participants 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 the delivery of our employment and / or education programmes.
- Inform you of relevant BITCI events, webinars etc.

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 participants and volunteers

Participants

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 Microsoft Dynamics in the cloud 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.

All other data is held in the Cloud (SharePoint) with regular backup in place (See ICT Policy)

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 or contract for a participant, your employment programme application details may be shared with the 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 up to 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. We will retain your name in perpetuity, in accordance with child safeguarding best practice.

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, but 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.

BITCI will embark to regularly review data it holds to ensure that accurate and relevant data is held for the purpose for which it is collected. Any records not required or found to be incorrect will be deleted.

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.

Queries or concerns

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@bitc.ie
- by phone at +353 1 874 7232
- by post at Head of Finance, **3rd Floor, Phibsborough Tower, Phibsborough, Dublin D07 XH2D**