

Institute of Technology Carlow (IT Carlow) and Carlow College, St Patrick's (Carlow College) signed a Memorandum of Agreement (MoA) in February 2019, which provides for various joint initiatives. This Privacy Notice refers to the management of personal data associated with one such initiative, collaborative projects.

IT Carlow and Carlow College are joint controllers of personal data, including any special categories of personal data, processed in connection with collaborative research projects. Personal data is shared between the institutions in order to administer and promote collaborative projects.

Both institutions process personal data in accordance with applicable data protection laws, including but not limited to, the General Data Protection Regulation (GDPR) (EU 2016/679) and the Data Protection Acts 1988 to 2018.

This Privacy Notice may be revised and expanded as other MoA initiatives come to fruition. It should be read in conjunction with the Employee Privacy Notices of both institutions.

Data Subjects

Employee personal data is shared between IT Carlow and Carlow College in the administration and promotion of collaborative research projects. This includes contact details, details of research projects, decisions made on applications and funding arrangements. The sources of employee data are employees themselves or their research partners, and the team that administers the initiative.

Research projects may involve the processing of personal data of research participants. This is further discussed in the Research Ethics section, which follows.

Research Ethics

Collaborative projects that are research based may involve the processing of personal data of research participants. Researchers are responsible for complying with data protection laws and the research ethics policies of both institutions. This includes that researchers are to provide suitable data privacy information to research participants.

Purposes of Data Processing

The purposes of processing employee data are to administer and promote collaborative projects. The purpose of processing research participant data is to conduct evidence-based research.

Legal Basis

Employee personal data is processed under Article 6(1)(b) of the GDPR. Researchers will determine the legal basis/bases applicable to the processing of research participants' data in accordance with data protection laws and the research ethics policies of both institutions.

Data Storage and Security

Both IT Carlow and Carlow College may store personal data arising from this initiative. Both institutions will store personal data securely and implement suitable technical and organisational measures in order to ensure its integrity and confidentiality, and to protect it against unauthorised access, loss, destruction or damage.

Data Retention

IT Carlow and Carlow College retain personal data in accordance with their respective records retention schedules. The retention of research participants' data will be determined by researchers, and will respect both the principles of data protection law and the research ethics policies of both institutions.

Data Recipients

Relevant personal data will be shared between IT Carlow and Carlow College in order to allow them to administer and promote collaborative projects. Each institution will ensure that it shares personal data only with parties who require it in connection with their duties. Employees should refer to the Employee Privacy Notice of their institution as personal data is processed and shared as outlined in that document.

The selection board will include a member external to the institutions. A data processing contract will be put in place with the external member.

Reporting to the HEA, as the funder, may be required.

External Reporting

Details of collaborative projects may be published publicly in order to promote the initiative and where relevant associated research outputs. This may include traditional media as well as the world wide web and social media. Reporting to the HEA, as the funder, may be required. Researchers are responsible for notifying research participants of recipients of their personal data.

Third-Country Transfer

Where personal data is transferred outside the European Economic Area (EEA), a suitable safeguard will be put in place.

Failure to Provide Data

You may decline to provide data in some circumstances. Where there is a statutory or contractual requirement for data the institutions may not be in a position to enter into or continue a contractual relationship with you, or to administer contractual benefits.

Consent

Any required consents will be sought. Where your consent to process personal data is sought, you may grant or refuse consent or later withdraw consent by contacting the party to whom it was granted. Withdrawal of consent does not affect the lawfulness of processing prior to withdrawal.

Data Protection Rights

Data subjects have the following rights:

<ul style="list-style-type: none">• The right to information about how we process your data• The right to access personal data we hold about you• The right to request the rectification of incomplete or incorrect data• The right to request the erasure of data	<ul style="list-style-type: none">• The right to restrict processing of data• The right to object to the processing of data• The right to data portability• The right not to be subject to a decision made solely by automated processing, including profiling.
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Data subjects may exercise their data protection rights by contacting either institution. Where beneficial or necessary, IT Carlow and Carlow College will assist each other in replying to data subject requests.

Data Protection Contacts

Colm O'Connor Senior Technical Officer Computing Services Department Institute of Technology, Carlow colm.oconnor@itcarlow.ie 059-9175669	Bernie Deasy Data Protection Officer Carlow College, St Patrick's bdeasy@carlowcollege.ie 059-9153200
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How to Make a Complaint

If you are unhappy with the way your personal data has been processed, you may, in the first instance, contact either institution using the contact details provided above. If you remain dissatisfied, you have the right to complain to the Data Protection Commission:

Email: info@dataprotection.ie

Telephone: +353 (0761) 104800 LoCall number 1890 25 22 31

Postal address: Data Protection Commission, Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23.

DOCUMENT CONTROL

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