



## **Cruit Éireann, Harp Ireland Data Protection Policy**

### **Purpose of this policy**

This policy is a statement of Cruit Éireann, Harp Ireland's commitment to protect the rights and privacy of individuals in accordance with the Data Protection Acts.

### **Data Protection Principles**

We shall perform our responsibilities under the Data Protection Acts in accordance with the following eight Data Protection principles:

- **Obtain and process information fairly**

We shall obtain and process personal data fairly and in accordance with statutory and other legal obligations.

- **Keep it only for one or more specified, explicit and lawful purposes**

We shall keep personal data for purposes that are specific, lawful and clearly stated. Personal data will only be processed in a manner compatible with these purposes as defined in the company personal data usage matrix.

- **Use and disclose only in ways compatible with these purposes**

We shall use and disclose personal data only in circumstances that are necessary for the purposes for which we collected the data.

- **Keep it safe and secure**

We shall take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of personal data and against its accidental loss or destruction.

- **Keep it accurate, complete and up-to-date**

We adopt procedures that ensure high levels of data accuracy, completeness and that data is up-to-date.

- **Ensure it is adequate, relevant and not excessive**

We shall only hold personal data to the extent that it is adequate, relevant and not excessive.

- **Retain for no longer than is necessary**

We have a retention policy for personal data.

- **Give a copy of his/ her personal data to that individual, on request**

We adopt procedures to ensure that data subjects can exercise their rights under the Data Protection legislation to access their data.

### **Responsibility**

Overall responsibility for ensuring compliance with Data Protection Acts rests with Cruit Éireann, Harp Ireland. However, our responsibility varies depending upon whether we are acting as either a data controller or a data processor. All employees and contractors of Cruit Éireann, Harp Ireland who separately collect, control or process the content and use of personal data are individually responsible for compliance with the Data Protection Acts. The Data Protection Co-Ordinator is Cruit Éireann, Harp Ireland's Data Protection Officer, and co-ordinates the provision of support, assistance, advice, and training within the organisation to ensure that the company is in a position to comply with the legislation.

### **Procedures and Guidelines**

Cruit Éireann Harp Ireland is firmly committed to ensuring personal privacy and compliance with the Data Protection Acts, including the provision of best practice guidelines and procedures in relation to all aspects of Data Protection.