

# MEMBER PRIVACY NOTICE AND DATA PROTECTION POLICY

## 1. Introduction

- 1.1 Institute of Geologists Ireland ('we', 'us' 'our') is committed to protecting your Personal Data. This Privacy Notice applies to your membership and sets out how we collect, use and protect your personal data.
- 1.2 This notice ("Notice") has been developed to inform our members about the privacy and security of personal data and to meet our obligations under the Data Protection Acts 1988 to 2003 and the General Data Protection Regulation (the "Data Protection Law"). Under Data Protection Law, personal data is information that identifies you as an individual or is capable of doing so ("Personal Data").
- 1.3 We comply with Data Protection Law and this Notice applies to the personal data collected, processed and stored by us through your membership.
- 1.4 For the purposes of Data Protection Law, we are the data controller of your Personal Data. You will find our contact details in the "Contact us" section below.
- 1.5 This privacy notice also applies to any third party contractors whose services are retained by the IGI.

### 2. How we gather data and Personal Data

- 2.1 We gather data from your application to become a member of the IGI and our dealings with you.
- 2.2 We gather Personal Data from data you have provided us for example by contacting us via email or through our website.

## 3. What kinds of Personal Data do we collect?

3.1 We only hold personal data that is directly relevant to our dealings with a given data subject. That data will be collected, held, and processed in accordance with the data protection principles and with this Notice in a reasonable and lawful manner. The member will be requested to provide the following information for provision of membership services and for the purpose of registering and applying for membership:

Company number 314400. Directors: Mairéad Glennon, Cian Ó Hora, Eoin Wyse, Jon Hunt



- (a) personal identification data, including: name, address, phone number and/or email address(es)
- (b) online identification data, including: IP address
- (c) supporting documentation to accompany your application such as, copy university qualifications, sample work experience reports, job details and training undertaken.
- 3.2 We do not collect or store any financial data belonging to our Members.
- 3.3 In order to facilitate payment of third party contractors engaged by the IGI, financial details are stored within the IGI banking system.

#### 4. **L**EGAL BASIS FOR PROCESSING

We rely on the following legal bases under Data Protection Law in processing your Personal Data:

Legal Basis	Example
Performance of a contract	We will process your Personal Data to the extent required to deliver the service requested.
Compliance with legal obligations	We may need to disclose Personal Data to comply with a request from law enforcement, or other government agencies or court order.
Legitimate interests	To provide updates to you.
Consent	We will share your data on our public register with your consent.

## 5. How we may use your Personal Data

- 5.1 Except as disclosed in this Privacy Notice, we will not disclose Personal Data that we collect to any parties other than those with whom we partner or are affiliated with, without your consent. Except as disclosed below, we will not sell, share, trade, rent, or give away your Personal Data.
- 5.2 Any and all personal data collected by us from our members (as detailed in this Notice) is collected in order to ensure that we can provide the services to its members under the terms of the services agreement with the member, that it provides the services in the best possible manner and that it can efficiently manage its members as a whole. Business processes for personal data necessary to fulfil the terms of the services agreement with you as the member include:
  - (a) direct provision of membership services to you



- (b) resolving issues arising in respect of the provision of the services or the services agreement with you
- (c) billing for services provided by us under the membership agreement with you
- (d) administration of member accounts, including:
  - (i) ensuring the ongoing provision of optimized services to you
  - (ii) informing you of the status of the services
  - (iii) implementing any changes to services, billing or member information as requested by you
- 5.3 In addition, we may also use member personal data to contact you regarding information on our services or updates and job opportunities. This contact takes place via our regular Members Bulletins issued direct from the IGI Office to registered members email addresses.
- 5.4 In addition, we maintain a database of members. When contacted by interested parties, for example local authorities, we will confirm your status as a member of IGI. We will seek your consent before including you in our register of members which is found on our website, www.igi.ie.
- 5.5 When you contact us, we may request your affirmative, positive consent to use your contact information for marketing or other business purposes. In the event you do not consent to the use of your contact information for marketing or other business purposes, your data will not be used for those purposes. If you provide your consent but subsequently do not wish to receive notifications about related opportunities, you will be able to modify your preferences by following the instructions on any marketing correspondence.

#### Do we disclose Personal Data to anyone else?

- Personal data may be disclosed internally when passed in accordance with the data protection principles and this Notice. Personal data is not passed to any internal department or any individual that does not reasonably require access to that personal data with respect to the purpose(s) for which it was collected and is being processed.
- 5.7 Relevant internal departments to whom personal data may be disclosed are as follows:
  - (a) The Board
  - (b) The Validation Committee
  - (c) Administration (for membership fees)
  - (d) The Ethics Committee
  - (e) The Disciplinary Committee
- 5.8 We shall disclose member information to third parties only when it is necessary as part of our business practices or when there is a legal or statutory obligation to do. Categories of such third parties may include:
  - (a) subcontractors



- (b) auditors
- (c) authorities to whom we are legally obliged to disclose member information, e.g. law enforcement, tax authorities, etc.
- 5.9 Whenever we disclose member information to third parties, we will only disclose that amount of personal information necessary to meet such business need or legal requirement. Third parties that receive member information from us must satisfy us as to the measures taken to protect the personal data such parties receive.
- 5.10 Appropriate measures will be taken to ensure that all such disclosures or transfers of member information to third parties will be completed in a secure manner and pursuant to contractual safeguards.
- 5.11 We may provide information, when legally obliged to do so and in response to properly made requests, for the purpose of the prevention and detection of crime, and the apprehension or prosecution of offenders. We may also provide information for the purpose of safeguarding national security. In the case of any such disclosure, we will do so only in accordance with Data Protection Law.
- 5.12 We may also provide information when required to do so by law, for example under a court order.
- 5.13 We may also transfer data to legal counsel where same is necessary for the defence of legal claims.
- 5.14 If there is any change in the ownership of IGI, or any of its assets, we may disclose personal information to the new (or prospective) owner. If we do so, we will require the other party to keep all such information confidential.
- 6. How long do we keep Personal Data?
- 6.1 The time period for which we retain information varies according to the use of that information. In some cases there are legal requirements to keep data for a minimum period of time. Unless specific legal requirements dictate otherwise, we will retain information no longer than is necessary for the purposes for which the data were collected or for which they are further processed.
- 6.2 Member personal data will be held for as long as the member holds a membership with us. Should a subject cease to become a member of the IGI their data will be retained for a period of no longer than three years. This is to facilitate them availing of a fast track membership application process should they wish to re-join the organisation during this three year period. Once a period of three years has passed, all data belonging to that subject will be removed from IGI databases, files (in both soft and hard copy) and will be destroyed.
- 6.3 Unsuccessful member applicant's data will be retained for a 12 month period and then securely destroyed.
- 7. How do we protect data about you when or if it is transferred out of Europe?
- 7.1 We do not transfer data outside of Europe currently. Any transfer of member personal data outside of the EEA would only be made through transfer mechanisms approved or allowed for under Data

Member of the European Federation of Geologists

Protection Law and we shall take all necessary steps to ensure that there is adequate protection, as required by Data Protection Law.

#### 8. How you can exercise your rights in respect of Personal Data we hold about you

## Your rights

- 8.1 We shall vindicate all your rights under Data Protection Law. These rights are as follows:
  - your right to withdraw your consent to the processing of Personal Data at any time
  - your right to request from us access to personal data and to have any incorrect personal data rectified
  - your right to the restriction of processing concerning you or to object to processing
  - your right to have your personal data transferred to another service provider
  - your right to have personal data erased (where appropriate)
  - information on the existence of automated decision-making, if any, as well as meaningful information about the logic involved, its significance and its envisaged consequences

Vindication of your rights shall not affect any rights which we may have under Data Protection Law.

## Exercising your rights, managing information and opting out

- 8.2 You may update or change information related to your membership by contacting us as outlined below. You may always opt-out of receiving future e-mail messages from us or request that your information be removed from a database by e-mailing us at the address provided above. You may also unsubscribe from our marketing communications by clicking on the "unsubscribe" link located on the bottom of our e-mails.
- 8.3 You can update or correct your Personal Data, remove it from our system or exercise any of your rights by making a request to us at the contact information provided below. If for some reason access is denied, we will provide an explanation of why access has been denied.
- 8.4 We will confirm your request within 21 days of receipt, and process your request within 30 days of receipt.

### 9. How do we protect Personal Data?

- 9.1 We employ reasonable appropriate administrative, technical, personnel procedural and physical measures to safeguard Personal Data against loss, theft and unauthorised uses access, uses or modifications. Security of these systems are monitored continuously.
- 9.2 While we try our best to safeguard your information once we receive it, no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure. It is important for you to protect against unauthorized access to your computer.
- 9.3 Where it is necessary to share members, or prospective members data, amongst IGI Board members or others as outlined in Section 5.7 above, then this takes place either via registered post in the case of hard copy documentation or, which is more usual, via email transfer using secure IGI domain email addresses. Personal email addresses for Board members or those listed in Section 5.7 above will not be used.



- 9.4 Any request for data must be sent via and the IGI office and the purpose and intention of the data being requested verified by the IGI office and/or IGI Board.
- 9.5 Hard copy files are retained for all members and prospective members. These hard copy files are stored in locked filing cabinets that are only accessible to the IGI administrator.
- 9.6 All electronic files belonging to the IGI or relating to IGI business are stored on a laptop device only accessible by the IGI administrator. Electronic file backups are stored on an external hard drive, again only accessible by the IGI administrator.
- 9.7 A clean desk policy is in place.

#### 10. DATA BREACHES

10.1 Should the IGI discover or be notified of a data breach, an investigation will be conducted with the purpose of establishing what data has been compromised and to establish how the breach occurred. Relevant parties will be notified including the IGI Board, the data subject, the Data Protection Commissioner (DPC) and other relevant regulators, insurers and solicitors where appropriate. Where necessary disciplinary action will be taken.

#### 11. How can you make a complaint about the use of Personal Data?

- 11.1 Complaints on the use, retention and disposal of personal data can submitted via email to info@igi.ie.
- 11.2 As a member you also have the right to lodge a complaint with the Data Protection Commission.

#### 12. REVIEW

- 12.1 This policy will be reviewed and updated from time to time to consider changes in the law and the experience of the policy in practice. Any and all changes will be advised to members and, if necessary, we will obtain your consent prior to applying any changes to any Personal Data collected from you prior to the date the change becomes effective. Your continued membership after such changes will be subject to the then-current policy. We encourage you to periodically review this Privacy Notice to stay informed about how we collect, use, and disclose personal information.
- 12.2 The IGI Board of the day are directly responsible for ensuring all policies are up-to-date and enforced,

### 13. **C**ONTACT INFORMATION

If you have questions about this Privacy Notice or our treatment of the information provided to us, please contact us at:

Name: Institute of Geologists Ireland

ATTN: IGI President

Address: 63 Merrion Square, Dublin 2.

Phone: 01 - 662 4914

E-mail: <a href="mailto:president@igi.ie">president@igi.ie</a> cc'ing info@igi.ie

