

The Garda Holiday and Travel Club

Data Protection Policy

Ghtc
May 15, 2018

Contents

Contents.....	2
1 Introduction.....	4
2 Policy Scope.....	4
3 Underlying Principles.....	4
5 Policy Objective.....	5
6 Data Protections Governance.....	5
6.1.1 Staff Records.....	5
6.1.2 Overview.....	5
6.1.3 Records Maintained.....	5
6.1.4 Purposes of Retaining data on Staff Members.....	6
6.2 General Membership records.....	6
6.2.1 Overview.....	6
6.2.2 Records Maintained.....	6
6.2.3 Purposes of Retaining General Membership Data.....	7
6.3 Board of Directors membership records.....	7
6.3.1 Overview.....	7
6.3.2 Records Maintained.....	7
6.3.3 Purposes of Retaining National Executive Membership Data.....	7
6.4 General Customer /client Records.....	8
6.4.1 Overview.....	8
6.4.2 Records Maintained.....	8
6.4.3 Purposes of Retaining Client/Customer Data.....	8
6.5 Booking Information.....	8
6.5.1 Overview.....	8
6.5.2 Records Maintained.....	Error! Bookmark not defined.
6.5.3 Purpose of Retaining Booking Information.....	Error! Bookmark not defined.
6.6 Third party suppliers who supply services to the GHTC.....	9
6.6.1 Overview.....	9
6.6.2 Records Maintained.....	9
6.6.3 Purpose of retaining Third Party Details.....	9
7 Security and Access Arrangements.....	9
7.1 File Retention.....	9
7.2.4 Security and Access Arrangements.....	10
8 Compliance with Data Protection Rules.....	10
8.1 Obtain and process information fairly: prompt questions.....	10
8.2 Keep it only for one or more specified, explicit and lawful purposes: prompt questions.....	11
8.3 Use and disclose it only in ways compatible with these purposes: prompt questions.....	11
8.4 Keep it safe and secure: prompt questions.....	11
8.5 Keep it accurate, complete and up-to-date.....	12
8.6 Ensure that it is adequate, relevant and not excessive.....	12
8.7 Retain it for no longer than is necessary for the purpose or purposes: prompt questions.....	12

9	Data Access.....	12
9.1	Handling Access Requests.....	13
9.2	Process for rectifying errors in records.....	13
10	Links to related Association policies.....	13
11	Monitoring and Implementing the Policy.....	14
12	Reviewing and Evaluating the Policy.....	14

1 Introduction

The Garda Holiday and Travel Club supports the principle set out in the legislation relating to Data Protection.

This policy is to inform all people whose data we hold that it is held in accordance with the legislation that it is secure, accurate, used for the purpose collected only and is accessible in accordance with the law.

GHTC Data Protection Policy was prepared in consideration of the implementation of the General Data Protection Guidelines in May 2018 and agreed in consultation with the GHTC Board of Directors on ***** 2018.

2 Policy Scope

The policy applies to the following categories of people in so far as the policy relates to them:

- All GHTC staff regardless of the position they hold;
- The Membership of the GHTC
- The Board of Directors of the GHTC;
- The Customers of the GHTC
- Customer Booking Information
- All organisations and companies who provide services to the GHTC

GHTC will hold data on individuals on computer and /or in paper files. These records will be secured to protect the personal and other sensitive information on individuals on a restricted basis, i.e. only people who have a legitimate and real reason for accessing the data will be given access to this data.–

The Data protection co-ordinator and compliance officer for GHTC is *****

Data protection co-ordinator and compliance officer: A data protection co-ordinator and compliance officer is the individual or legal entity which controls the contents and use of personal data. The ghtc can be considered to be the data protection co-ordinator and compliance officer, with the ?????????? acting for the club in exercising the functions involved.

3 Underlying Principles

In order to function effectively and perform our primary function as a Travel Agency for our members it is necessary to capture, process and retain certain information on Staff, Board Members, Customers, Suppliers and the Membership generally.

5 Policy Objective

GHTC's Data Protection Policy is designed to

- A. Comply with current legislation and be robust enough to accommodate any future changes
- B. Ensure data is collected in line with rules for data collection, retention, processing and access.
- C. To ensure that the data protection rights of staff, directors, members and our customers generally are safeguarded.

6 GHTC's Data Protections Governance

Set out here under is the categories of data that GHTC will or may record, the purpose for which the data is gathered and the format in which it will be held.

Details of data which will or may be held by GHTC include

- Staff Records
- General membership records
- Board of Directors' records
- Clients records
- Client Booking Information
- Third party suppliers who supply services to the Club

6.1.1 Staff Records

6.1.2 Overview

Staff records will be created and retained in accordance with the General Data Protections Guidelines for all fulltime and any staff who may be engaged on a part-time basis.

Records relating to people applying for positions within the GHTC may also be retained as may records of former members of staff but in this instance records will comply with the guidelines for data retention.

6.1.3 Records Maintained

The following are a list of some of the staff records maintained

- Name, address and contact details, PPS number;
- Details of pay, PAYE and superannuation payments made to staff
- Original records of application and appointment;
- Details of approved absences (career breaks, maternity leave, parental leave, study leave etc.);
- Details of any accidents/injuries sustained on GHTC property or in connection with the staff member carrying out GHTC business;
- Details of any absence due to sickness;
- Records of disciplinary issues and/or sanctions imposed.

6.1.4 Purposes of Retaining data on Staff Members

Staff records are maintained to allow the GHTC properly administer and ensure staff are properly remunerated and to ensure compliance with Organisation policy.

- The management and administration of GHTC business (now and in the future)
- To facilitate the payment of staff, and calculate other benefits/ entitlements (including reckonable service for the purpose of calculation of pension payments, entitlements and/or redundancy payments where relevant)
- To facilitate pension payments in the future
- To enable the GHTC to comply with its obligations as an employer including the preservation of a safe, efficient working environment (including complying with its responsibilities under the Safety, Health and Welfare At Work Act. 2005)
- To enable the GHTC to comply with requirements set down by the Revenue Commissioners.

6.2 General Membership records

6.2.1 Overview

General membership records will be created and retained in accordance with the General Data Protections Guidelines for the proper administration of their membership of the GHTC and to ensure they receive the entitlements of membership including the benefits of GHTC Member Insurance.

6.2.2 Records Maintained

The following are a list of the general membership records which may be maintained:

- Name, address and contact details.
- Garda Registration number.

- Date of joining the GHTC
- E-mail address, where provided
- Details whether member is a serving or retired Garda
- Date of birth where supplied

6.2.3 Purposes of Retaining General Membership Data

The maintenance of general membership records is necessary to ensure the proper administration of the GHTC business. Only paid up members of the GHTC can avail of certain services and benefits provided by the GHTC. We need current, up to date and accurate records to communicate important information to the membership relating to the business of the GHTC which could impact on their travel plans and travel insurance. Contact information may be made available to fellow GHTC member for the purposes of balloting regarding election to the board of directors.

6.3 Board of Directors' membership records

6.3.1 Overview

The Board of Directors is the governing body of the GHTC. Director member records are necessary to allow the administrative staff to communicate effectively with the Governance body. Regulatory compliance also dictates that these records must be maintained.

6.3.2 Records Maintained

In addition to the details maintained for general membership the following records will be maintained for the Directors of GHTC

- Home address details
- Mobile phone details
- Email address details
- Date of commencement of Directorship
- Date left the Board of Directors (If relevant)
- Date of Birth
- PPS Number
- Registration/Pension Number
- Position held by each director eg Chairman, Treasurer, Secretary

6.3.3 Purpose of maintaining Directors Membership Data

The maintenance of Directors' membership records is necessary to ensure the proper administration of the GHTC's business. As the governing body of the GHTC they are

required to be constantly communicated with on issues relevant to the GHTC which impacts the general membership. Additionally this information is required for the annual audit of the GHTC's financial accounts and for securing our Bond with the Commission for Aviation

6.4 General Customer/Client Records

6.4.1 Overview

GHTC retain details of customer/client records. These records are necessary to ensure there is a proper functioning as a Travel Agency supplying a service to our clients. It also allows for effective communications with customers/clients on matters of importance generally.

6.4.2 Records Maintained

In addition to the details maintained for general membership the following records will be maintained for customers/clients

- Email addresses
- Passport details
- Date of Birth
- Details of planned Travel
- Details of past Travel

6.4.3 Purposes of Retaining Clients/Customer Data

The GHTC act as an agent to book travel on behalf of our customers/clients. In order to do this we require information such as passport details and dates of birth. If we do not have these details we cannot complete a booking. Any information that is maintained by the GHTC is used for specific purpose only.

With permission, email addresses are also used as a form of communication with our clients/customers. This communication is in the form of the GHTC newsletter. You will be given the opportunity to opt out of any e-communication we send to you should you wish to do so.

It may be necessary to contact clients/customers either prior to departure or during the time that they are abroad to advise of changes in travel itineraries.

6.5 Booking Information

6.5.1 Overview

The information that we use is for the purpose of fulfilling our contract with you. This information may be passed on to the relevant travel providers of your travel arrangements. The information may be provided to public authorities such as customs or immigration if required by them or as required by law. This applies to sensitive information such as dietary requirements, passport details and disabilities. If you do not provide us with this information we will not be in a position to arrange your travel.

6.5.2 Records Maintained about You and Your Travelling Party

- Name, address and contact details
- Passport details
- Disabilities
- Dietary Requirements
- Medical Information regarding Travel Insurance

6.5.3 Purpose for Retaining This Booking Information

In order to act as your Travel Agent and make travel arrangements on your behalf this information is necessary. We must also pass on this information to the relevant travel provider such as an airline or cruise company for example. Your information is only passed to the relevant travel provider with your consent. If you do not consent we will be unable to make your travel arrangements. Any information given to us regarding your travel arrangements will only be used for that purpose.

6.6 Third party suppliers who supply services to the Association

6.6.1 Overview

GHTC have a relationship with third party providers who assist us in delivering a service to our membership. These include:

- Insurance companies
- Tour Operators
- Airlines
- Cruise Companies
- Bedbanks
- Printing companies
- Consultant companies
- Advisors to the GHTC.

6.6.2 Records Maintained

GHTC retain

- Contact details of third party; correspondence address, telephone numbers and e-mails address
- Bank account details

6.6.3 Purpose of retaining Third Party Details

It is necessary to maintain certain records to ensure effective communications with our third party providers in relation to matters relating to our members bookings, travel arrangements and insurance.

Details are also necessary to allow us make appropriate payments to individuals for the services delivered.

7 Security and ACCESS Arrangements

7.1 File Retention

Files will be retained as follows:

6.1.5.1 *In the case of electronic data:*

In a password protected section of the data base.

- The Manager,
- Reservation Staff,
- Administration Staff

6.1.5.2 *In the case of paper records*

Filing cabinets in the main office and will be capable of being locked and which will be locked when the office is vacant. Older files are stored for the required amount of time in a secure storage room. Other sensitive data will be stored in a fire proof safe in a locked office.

Employees with specific access to this information will be required to keep the information confidential and will be instructed not to discuss the content of staff files with people not entitled to such information.

6.2.4 Security and Access Arrangements

Records are maintained on a data base at the offices of GHTC. This data base is accessed only by people working in the office who have access rights. Access to the Data Base is password protected.

The information is only accessed where there is a need to establish a material fact relating to the member which is necessary as part of a matter under consideration by the GHTC.

When not required the computers through which the information is accessed is locked. When the office is closed for business the office housing the computers are locked.

8 Compliance with Data Protection Rules.

The Data Protection Legislation sets down eight rules for data protections. These rules stipulate that data is:

1. Obtain and process information fairly
2. Keep it only for one or more specified, explicit and lawful purposes
3. Use and disclose it only in ways compatible with these purposes
4. Keep it safe and secure
5. Keep it accurate, complete and up-to-date
6. Ensure that it is adequate, relevant and not excessive
7. Retain it for no longer than is necessary for the purpose or purposes
8. Give a copy of his/her personal data to that individual on request.

GHTC's policy aims to ensure that all personal data records held by them are obtained, processed, used and retained in accordance with these eight rules.

8.1 Obtain and process information fairly: prompt questions

GHTC advises all staff members, other persons whose personal information is collected from that the information is

- Collected by GHTC
- The purpose in collecting this data
- The persons or categories of persons to whom the data may be disclosed and any other information which is necessary so that processing may be fair

Our Data Protection policy is published on our website.

All people who provide data are advised of the need to advise GHTC of any material change in information held on file to allow us comply with the data protection rules.

8.2 Keep it only for one or more specified, explicit and lawful purposes: prompt questions

GHTC only collect data which is necessary for the proper administration of GHTC business or to comply with necessary legislation. We advise members and staff of the reason the data is collected by way of our data protection policy as outlined above.

If we require additional information we will advise the client/customer, member or staff member of the reason that data is required in line with the data protection rules.

8.3 Use and disclose it only in ways compatible with these purposes: prompt questions

GHTC only use the data in its control for the purpose for which it was gathered. Data is maintained securely and is accessed only by those who are entitled to access it and then only when there is a legitimate reason.

Where data has to be transferred outside the GHTC we will make every effort to ensure it is transferred securely to a source who is entitled to this information.

GHTC recognise there may be a requirement to release data in its control in accordance with law. In these circumstances we will comply with a lawful requirement.

8.4 Keep it safe and secure: prompt questions

GHTC undertakes to maintain data under its control securely. It will not release data in its control to people or bodies that are not entitled to have access to such data.

Data is secured as set out in Section 7 above.

Data will not be removed from the GHTC Offices unless there is a specific requirement to do so. Data removed off site in paper format will be held securely in the custody of the person transporting the data. Where data is transferred on a laptop or other portable device it will be in encrypted format and the device will be password protected.

An annual review will be carried out to evaluate the measures and practices in place and improvements identified taken. Additionally all staff members will be reminded of the policy to ensure compliance.

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

GHTC is committed to maintaining all data in its control accurate and up to date. Members and staff will be reminded of the requirement of the GHTC to keep accurate data and will be advised to provide material changes which impact on data held by GHTC.

Staff should ensure the accuracy and completeness of data they record and they have a responsibility to update any irrelevant or out of date information e.g. change of address.

Any errors found in member/staff record should be addressed immediately. Any core data found to be incorrect or erroneous on an ICT system should be dealt with immediately by an authorised person. Any changes or amendments to personal data are recorded and fully auditable and in accordance with relevant GHTC policies.

In the case of active/open files emphasis must be on ensuring that the most up to date information is recorded at all times.

Staff must ensure that due care is taken to update and record data correctly and all data must be updated immediately.

It is the responsibility of the Manager to ensure that all information recording is done so properly and to ensure accuracy of information by regular audit.

8.6 Ensure that it is adequate, relevant and not excessive

Only personal data necessary to allow the GHTC fulfil its obligations to its membership and customers or under the law and to ensure the proper administration of the business of the GHTC will be held. Data which is not required will not be captured and where unnecessary data is identified it will be deleted.

8.7 Retain it for no longer than is necessary for the purpose or purposes: prompt questions

In general, personal data will not be kept for any longer than is necessary.

Pay, taxation and related GHTC personnel service records may be retained indefinitely within the GHTC.

9 Data Access

Under the legislation individuals have a right to know what data is held on record about them, the purpose for which the information is held and who has access to the information.

GHTC is committed to providing this information to individuals in line with the Data Protection policy and timelines.

GHTC will comply with access requests which are made to the GHTC. Appendix **** outlines the process for making an access request.

9.1 Handling Access Requests

Access requests will be made to the Data protection co-ordinator and compliance officer for the Association.

Data relevant to the individual only will be released in accordance with the Data Protection rules.

It is the GHTC's policy to seek evidence of identity of people seeking information where the person is not known personally to the Data protection co-ordinator and compliance officer. Written applications for data requests will be verified and responses which are to be returned will only be returned to the address held on file at the GHTC for the individual.

Where an access request is made a systematic check of all paper and computer records will be completed to ensure requests are complete when returned.

GHTC will provide the information in a form which is clear and easy to understand. Correspondence to applicants will be advised of their right to have inaccurate information corrected within 28 days of receipt of their application.

9.2 Process for rectifying errors in records

In the event of an applicant identifying an error on their records GHTC will immediately rectify the record. In this regard all records paper and computer records will be examined to ensure all information held is rectified.

Once a record has been rectified the applicant will be advised of the changes made.

10 Links to related Association policies

GHTC policies need to be consistent with one another, within the framework of the overall GHTC Plans. Relevant GHTC policies already in place, being developed or reviewed, should be examined with reference to the data protection policy and any implications which it has for them should be addressed.

The following policies may be among those considered:

- The Company Handbook
- The Company Safety Statement

11 Monitoring and Implementing the Policy

On an annual basis the manager will report on the functioning of the policy. In this regard the security of the data will be examined to ensure people who should have access have access and the data is complete and accurate.

12 Reviewing and Evaluating the Policy

The Board of Directors will ensure a review and evaluation the Data Protection Policy is carried out at least every two years. The Board will arrange for an earlier review if there is a legislative change, or information or guidelines from the Data Protection Commissioner or on receipt of feedback from members and or staff of The Garda Holiday and Travel Club.

