

#filmfleadh



31<sup>st</sup> edition

Tuesday 9<sup>th</sup> – Sunday 14<sup>th</sup>, July 2019

**Phone** 091-562200 **Email** info@filmfleadh.ie **Website** www.galwayfilmfleadh.com **Address** 36D Merchants Dock, Merchants Road, Galway, H91 CX8H, Ireland

# Personal Data Protection Policy

Updated 28/05/19

**Chief Executive Officer** Miriam Allen **Programmer** William Fitzgerald **Galway Film Fair** Debbie McVey  
**Administrator** Cathy O'Connor **Administrative Co-ordinator** Annette Maye  
**Board of Directors** Kate O'Toole (Chair) | Brendan McCaul | Redmond Morris | Siún Ní Raghallaigh | Steve Woods  
**CRO** 351264 **RCN** 20153731

## Table of contents

<b>Definitions</b>	<b>3</b>
<b>Introduction</b>	<b>3</b>
<i>Digital communications channels</i>	3
<b>Changes To This Policy</b>	<b>4</b>
<b>Where, why &amp; how do we collect and use your information?</b>	<b>4</b>
<i>Website</i>	4
Cookies	4
Disabling cookies	4
Analytics	4
<i>Social Media</i>	5
<i>Third Parties</i>	5
<i>What will we do with your information?</i>	6
<i>Keeping your information safe</i>	7
<i>Requesting the information we and/or our 3<sup>rd</sup> parties hold (Subject Access Request)</i>	7
<i>Legal basis for collection and processing your information</i>	7
<b>The General Data Protection Regulation</b>	<b>8</b>
<i>Fundamental concepts</i>	8
<i>Compliance</i>	8
<i>Data Protection Officer</i>	9
<i>Rights of The Individual</i>	9
<i>Consent</i>	9
<i>Transfer of Personal Data</i>	9
<b>Privacy by design</b>	<b>10</b>
<b>Staff responsibilities</b>	<b>10</b>
<b>Personal data protection policy</b>	<b>10</b>
<i>Principles</i>	10
<i>General provisions</i>	11
<i>Lawful, fair and transparent processing</i>	11
<i>Lawful purposes</i>	11
<i>Data minimisation</i>	11
<i>Accuracy</i>	11
<i>Archiving/removal</i>	11
<i>Retention</i>	11
<i>Security</i>	12
<i>Breach Notifications</i>	12

## Definitions

<b>The organisation</b>	means Galway Film Fleadh Ltd., a registered charity (RCN: 20153731).
<b>GDPR</b>	means the General Data Protection Regulation (2016).
<b>Responsible Person</b>	means Shane Malone.
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by the organisation.

## Introduction

The Galway Film Fleadh Ltd. (CRO: 351264) is a registered charity (RCN: 20153731), which incorporates the Galway Film Fleadh, the Galway Film Fair and the Junior Galway Film Fleadh.

We are committed to protecting your privacy. We will only use the information that we collect about you lawfully, in accordance with the provisions of GDPR. We will be clear when we collect your data and will not do anything you wouldn't reasonably expect.

Developing a better understanding of our customers and supporters through their personal data allows us make better decisions about programming, fundraise more efficiently and, ultimately, helps us to achieve our mission of being at the forefront of developing a vibrant and successful film and moving image industry and culture across Ireland.

In its everyday business operations the organisation makes use of a variety of data about identifiable individuals, including data about:

- Current, past and prospective employees
- Applicants, submitters, prospective event participants and accepted event participants and other types of involved persons
- Customers
- Users of its websites
- Digital marketing channel subscribers
- Sponsors & advertisers

In collecting and using this data, the organization is subject to a to the articles of the GDPR controlling how such activities may be carried out and the safeguards that must be put in place to protect it.

The purpose of this policy is to set out the relevant legislation and to describe the steps the organisation is taking to ensure that it complies with it.

This control applies to all systems, people and processes that constitute the organisation's information systems, including board members, directors, employees, suppliers and other third parties who have access to organisational systems.

### Digital communications channels

The organisation operates the following websites:

- <https://www.galwayfilmfleadh.com>
- <https://junior.galwayfilmfleadh.com>
- <https://fair.galwayfilmfleadh.com>

The organisation operates the following social media channels:

- <https://www.facebook.com/GalwayFilm>
- <https://www.facebook.com/JuniorFilmFleadh>
- <https://www.twitter.com/GalwayFilm>
- <https://www.twitter.com/JuniorFleadh>

- <https://www.instagram.com/GalwayFilm>
- <https://www.instagram.com/JuniorFleadh>
- <https://www.youtube.com/filmfleadh>
- <https://www.youtube.com/channel/UCe1-2MsgRz2cQrPBfuz5WVA>

## Changes To This Policy

We may revise and update this Privacy Policy at any time. We will indicate at the top of our privacy statement when this Privacy Policy was last revised. We will also inform all existing data subjects via email. Please periodically review the policy.

## Where, why & how do we collect and use your information?

You may give us your information in order to browse our websites, book tickets, sign up to a newsletter, sponsor/fund us, or communicate with us. Communication with us includes, but is not limited to:

- Your employment as a member of staff
- Attending one of our events as a member of the public, a member of the film industry or as part of a group booking for the Junior Film Fleadh
- Signing up to our email newsletter
- Interacting with our website (anonymous information only)
- Interacting with our social media pages
- Submitting/applying to:
  - Have your feature or short film screened
  - Have your film project featured in the Film Fair Marketplace
  - Take part in a masterclass
  - Take part in our pitching competition
- Volunteering with us
- Interacting with the organisation as a business services provider
- Interacting with the organisation as an event funder/sponsor/advertiser
- Inviting you to attend an event as a guest of the festival

## Website

### Cookies

Cookies are small pieces of information that may be stored by your browser on your computer's hard drive. They make it possible for us to provide our online ticketing service and track visitor statistics, such as returning visitors, and allow you to stay logged in to our websites.

Cookies use information about your browsing in order to make advertising more relevant to you and your booking interests. These Cookies are used to deliver adverts more relevant to you and your booking interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of our digital advertising campaigns. They are placed by third party advertising networks on our behalf and with the organisation's permission. They remember that you have visited our website and this is shared with other organisations such as media owners. For more information on cookies, please visit these pages on Google and cookie central. Please note that we are not responsible for information available on these websites.

### Disabling cookies

You can prevent the setting of cookies by adjusting the settings on your browser. Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies may result in the disabling of certain functionality and features on our website.

### Analytics

Cookies set by our websites enable the organisation to analyse the website using Google Analytics. On some of our sites we may also use the Advertising Features of Google Analytics to find out more about the demographics and interests of our visitors.

When you visit a website and see an advertisement a cookie is placed on your computer or device by, for example DoubleClick (Google's Internet ad serving business) and then if you visit another site that has ads served by DoubleClick,

the same cookie can be read and modified by DoubleClick. By tracking what kind of sites you visit and how you interact with ads for different products and services, Google aims to build up a picture of who you are; your age, gender and interests. Using the Advertising Features of Google Analytics means we receive reports that tell us who Google thinks is visiting our site by age, gender and interests.

This information is anonymous and no Personally Identifiable Information is gathered from users. We use this information to report to our funders, such as the Arts Council, Failte Ireland, Galway City Council, Galway County Council, and internally for us to better understand how visitors use our websites and marketing purposes.

### Social Media

Depending on your settings or the privacy policies for social media and messaging services like Instagram, Facebook, WhatsApp or Twitter, you might give us permission to access information from those accounts or services.

### Third Parties

We utilise a number of third party softwares ('processors') to aid us in performing basic data processing, management of submissions, reviews, applications, film exhibition & guests, selling tickets, fundraising & accepting electronic payment, and analysing our sales and audiences. These include, but are not limited to:

<i>Name</i>	<i>Data stored</i>	<i>Privacy policy</i>
<b>WordPress</b>	Belgium/globally	<a href="#">Link</a>

Our websites run on this Content Management System (CMS) website software. Any data entered into forms on our website is stored within its database, along with the software placing cookies on your computer. Further to this instance, the software also connects with its parent company to provide administrative services.

<i>Name</i>	<i>Data stored</i>	<i>Privacy policy</i>
<b>WP-Engine</b>	Belgium	<a href="#">Link</a>

Our installation of WordPress runs on the servers of this web hosting company.

<i>Name</i>	<i>Data stored</i>	<i>Privacy policy</i>
<b>The Town Hall Theatre (and it's ticketing software Tickets.com)</b>	U.S./Australia/U.K./Germany	<a href="#">Link</a>

Bookings for screenings during our main event in July take place utilising this venues ticketing software.

<i>Name</i>	<i>Data stored</i>	<i>Privacy policy</i>
<b>Pálás (and it's ticketing software AdmitOne)</b>	United Kingdom	<a href="#">Link</a>

Bookings for screenings during our young person's event in November take place utilising this venues ticketing software.

<i>Name</i>	<i>Data stored</i>	<i>Privacy policy</i>
<b>Eventival</b>	Czech Republic	<a href="#">Link</a>

Film submissions, marketplace applications, masterclasses applications, pitching entries, accepted film exhibition processes and invited guest administration takes place using this software.

<i>Name</i>	<i>Data stored</i>	<i>Privacy policy</i>
<b>Skeleton Software</b>	Czech Republic	<a href="#">Link (in Czech)</a>

Eventival sub-contractor, whose smartphone app software connects to the Eventival database.

<i>Name</i>	<i>Data stored</i>	<i>Privacy policy</i>
<b>Microsoft</b>	Ireland/Finland/Austria/Holland	<a href="#">Link</a>

Maker of Office 365 and Windows, two softwares we utilise to perform basic data processing, data storage and basic administration.

<i>Name</i>	<i>Data stored</i>	<i>Privacy policy</i>
<b>Apple</b>	Globally	<a href="#">Link</a>

Maker of macOS and iOS, two softwares we utilise to perform basic data processing, data storage and basic administration.

<i>Name</i>	<i>Data stored</i>	<i>Privacy policy</i>
<b>Google</b>	Globally	<a href="#">Link</a>

Maker of Gmail, Google Drive, Google Analytics, Google Ads, YouTube and Android, six softwares we use to perform basic data processing, data storage, audience analysis, marketing and basic administration.

<i>Name</i>	<i>Data stored</i>	<i>Privacy policy</i>
<b>The Galmont Hotel (and it's administration software BookingAssist)</b>	Ireland	<a href="#">Link</a>

Our primary accommodation partners, we may pass them your information if you are an invited guest who we are performing an accommodation booking on behalf of.

<i>Name</i>	<i>Data stored</i>	<i>Privacy policy</i>
<b>PayPal</b>	Globally	<a href="#">Link</a>

Providers of electronic payment services. Available for payment services via both WordPress or Eventival.

<i>Name</i>	<i>Data stored</i>	<i>Privacy policy</i>
<b>Ryanair</b>	Globally	<a href="#">Link</a>

We may utilise the online booking software provided by this airline to perform travel bookings on your behalf if you are an invited guest we are co-ordinating travel arrangements for.

<i>Name</i>	<i>Data stored</i>	<i>Privacy policy</i>
<b>Aer Lingus</b>	Ireland	<a href="#">Link</a>

We may utilise the online booking software provided by this airline to perform travel bookings on your behalf if you are an invited guest we are co-ordinating travel arrangements for.

<i>Name</i>	<i>Data stored</i>	<i>Privacy policy</i>
<b>Stripe</b>	Globally	<a href="#">Link</a>

Providers of electronic payment services. Available for payment services via both WordPress or Eventival.

<i>Name</i>	<i>Data stored</i>	<i>Privacy policy</i>
<b>Mailchimp</b>	United States	<a href="#">Link</a>

Electronic newsletter software. If you sign up to a newsletter on our websites or create an account within our Eventival instance, your contact details will be added to this software.

<i>Name</i>	<i>Data stored</i>	<i>Privacy policy</i>
<b>Western Digital</b>	Globally	<a href="#">Link</a>

Makers of our in house storage systems and related access software MyCloud.com. We utilise this software to access some personal data remotely.

### What will we do with your information?

- Manage your relationship with the organisation as an employee or contractor
- Provide you with tickets, products or information you bought/asked for
- Administer your ticket sale or donation
- Keep a record of your relationship with us
- Ensure we know how you prefer to be contacted
- Understand how we can improve our services, products or information
- To tell you about changes in our services or new services, events and offers we think you'll find of interest
- To analyse your personal information and to create a profile of your interests and preferences so that we can contact you with information relevant to you
- Sign you up to mailing lists that you've opted in to
- Provide information about partnerships with, and events at, other venues/organisations
- Administration of your application to be including in any part of any events programme of screenings and events in a given year

### Keeping your information safe

We take every precaution to protect your information. To this end, all personally identifiable information stored by us is held within servers in a secure environment (where data is stored by one of our processors) or on our own secure password protected computers. Only employees and approved data processors we may appoint from time to time and who need the information to perform a specific job are granted access to personally identifiable information. Regular security reviews are held by us to ensure that your data remains safe and secure for your protection.

### Requesting the information we and/or our 3<sup>rd</sup> parties hold (Subject Access Request)

If you want to see what information we hold, withdraw consent, object to processing, request rectification/erasure, data portability or submit a Subject Access Request, please contact our Data Protection Officer, Shane Malone or visit this page to fill out a Subject Access Request form. If you wish to submit a form by post, please print the last page of this document and return it to:

Data Protection Officer,  
Galway Film Fleadh,  
36D Merchants Dock,  
Merchants Road,  
H91 CX8H,  
Galway,  
Ireland

We cannot accept Subject Access Requests over the phone, as we will be unable to verify your identity.

### Legal basis for collection and processing your information

We collect and process your data using one of the following legal bases:

- **Contractual**  
By purchasing a ticket, a pass, membership or applying to have your film (or portion thereof if applying for inclusion in the Marketplace or Pitching Competition) included in our event programmes, you are entering in to a contract with Galway Film Fleadh Ltd.
- **Legitimate interest**  
By purchasing a ticket, pass or Membership, applying to have your film (or portion thereof if applying for inclusion in the Marketplace or Pitching Competition) included in our event programmes or attending as a guest, you are entering in to a contract with the Galway Film Fleadh Ltd. and we require access to your information in order to fulfil your purchase, process your application, administrate your stay with us as a guest, to analyse your data and to send you relevant communication
- **Consent**  
You may opt in to receiving communications from one of Galway Film Fleadh Ltd.'s businesses

## The General Data Protection Regulation

The General Data Protection Regulation (GDPR) is a standout amongst the most noteworthy bits of enactment influencing the way that the organisation does its data preparing exercises. Huge fines are relevant if a breach is esteemed to have happened under the GDPR, which is intended to secure the individual information of nationals of the European Union. It is the organisations strategy to guarantee that our consistence with the GDPR and other important legislation is clear and verifiable consistently.

### Fundamental concepts

The most important concepts from GDPR regulation that are consistent within our organization and apply properly for this policy are the following:

*Personal data* is defined as:

*“any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”;*

*‘processing’* means:

*“any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction”;*

*‘controller’* means:

*“the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law”;*

### Compliance

The following actions are undertaken to ensure that the organisation complies at all times with the accountability principle of the GDPR:

- The legal basis for processing personal data is clear and unambiguous
- A Data Protection Officer is appointed with specific responsibility for data protection in the organization
- All staff involved in handling personal data understand their responsibilities for following good data protection practice
- Training in data protection has been provided to all staff
- Rules regarding consent are followed
- Routes are available to data subjects wishing to exercise their rights regarding personal data and such enquiries are handled effectively
- Regular reviews of procedures involving personal data are carried out
- Privacy by design is adopted for all new or changed systems and processes
- The following documentation of processing activities is recorded:
  - Organisation name and relevant details
  - Purposes of the personal data processing
  - Categories of individuals and personal data processed
  - Categories of personal data recipients
  - Agreements and mechanisms for transfers of personal data to non-EU countries including details of controls in place
  - Personal data retention schedules
  - Relevant technical and organisational controls in place

These actions are reviewed on a regular basis as part of the management review process of the information security management system.

## Data Protection Officer

A defined role of Data Protection Officer (DPO) is required under the GDPR if an organization is a public authority, if it performs large scale monitoring or if it processes particularly sensitive types of data on a large scale. The DPO is required to have an appropriate level of knowledge and can either be an in-house resource or outsourced to an appropriate service provider.

Based on these criteria, the organisation requires a Data Protection Officer to be appointed. The appointed person for the organisation is Shane Malone ([shane@filmfleadh.ie](mailto:shane@filmfleadh.ie)), Technical Co-ordinator.

## Rights of The Individual

The rights of the data subject are paramount under the GDPR. These consist of:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

Each of these rights must be supported by appropriate procedures within the organisation that allow the required action to be taken within the timescales stated in the GDPR.

These timescales are shown below:

<b>Data Subject Request</b>	<b>Deadline</b>
The right to be informed	When data is collected (if supplied by data subject) or within one month (if not supplied by data subject)
The right of access	One month
The right to rectification	One month
The right to erasure	Without undue delay
The right to restrict processing	Without undue delay
The right to data portability	One month
The right to object	On receipt of objection
Rights in relation to automated decision making and profiling	Not specified

## Consent

Unless it is necessary for a reason allowable in the GDPR, explicit consent must be obtained from a data subject to collect and process their data. In case of children below the age of 16 parental consent must be obtained. Transparent information about our usage of their personal data must be provided to data subjects at the time that consent is obtained and their rights with regard to their data explained, such as the right to withdraw consent. This information must be provided in an accessible form, written in clear language and free of charge.

If the personal data are not obtained directly from the data subject then this information must be provided within a reasonable period after the data are obtained and definitely within one month. The organisation gathers information from 3<sup>rd</sup> parties where the data subject has given explicit consent for that 3<sup>rd</sup> party to list their information publicly.

## Transfer of Personal Data

Transfers of personal data outside the European Union must be carefully reviewed prior to the transfer taking place to ensure that they fall within the limits imposed by the GDPR. This depends partly on the European Commission's judgement as to the adequacy of the safeguards for personal data applicable in the receiving country and this may change over time.

The organisation makes use of a number of 3<sup>rd</sup> party softwares – some of these 3<sup>rd</sup> parties may make use of servers that reside outside of the EU. Our list of 3<sup>rd</sup> party softwares on page 4 of this document outlines which softwares may store data in this manner. All such softwares have submitted up to the [EU – US privacy shield](#) and information on their operations within this framework is available from the individual softwares privacy policies.

## Privacy by design

The organisation has adopted the principle of privacy by design and will ensure that the definition and planning of all new or significantly changed systems that collect or process personal data will be subject to due consideration of privacy issues, including the completion of one or more data protection impact assessments.

The data protection impact assessment will include:

- Consideration of how personal data will be processed and for what purposes
- Assessment of whether the proposed processing of personal data is both necessary and proportionate to the purpose(s)
- Assessment of the risks to individuals in processing the personal data
- What controls are necessary to address the identified risks and demonstrate compliance with legislation

Use of techniques such as data minimization and pseudonymisation will be considered where applicable and appropriate.

## Staff responsibilities

Any staff member of the organisation who is involved in the collection, storage or processing of personal data has responsibilities under the legislation. They will make sure;

- to obtain and process personal data fairly
- to keep such data only for explicit and lawful purposes
- to disclose such data only in ways compatible with these purposes
- to keep such data safe and secure
- to keep such data accurate, complete and up-to-date
- to ensure that such data is adequate, relevant and not excessive
- to retain such data for no longer than is necessary for the explicit purpose

Staff/contractors who receive any subject access requests will immediately forward them to the Data Protection Officer.

## Personal data protection policy

### Principles

As per GDPR regulation, there are 7 principles involving personal data and how companies should treat these aspects. These are as follows, as listed in Chapter II, Article 5.1:

1. Personal data shall be:
  - a. processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency')
  - b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation')
  - c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')
  - d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy')
  - e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the

- appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation')
  - f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality')
2. The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1 ('accountability')

The organisation complies with these principles by using business workflows based on technology that use metadata in order to search, discover, classify, label, protect and apply actions at all levels of personal data.

### General provisions

- a. This policy applies to all personal data processed by the organisation
- b. The Responsible Person shall take responsibility for the organisation's ongoing compliance with this policy
- c. This policy shall be reviewed at least annually
- d. The organisation shall register with the Data Protection Commission (Ireland) as an organisation that processes personal data

### Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the organisation shall maintain a Register of Systems
- b. The Register of Systems shall be reviewed at least annually
- c. Individuals have the right to access their personal data and any such requests made to the organisation shall be dealt with in a timely manner

### Lawful purposes

- a. All data processed by the organisation must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests
- b. The organisation shall note the appropriate lawful basis in the Register of Systems
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the organisation's systems

### Data minimisation

- a. The organisation shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed

### Accuracy

- a. The organisation shall take reasonable steps to ensure personal data is accurate
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date
- c. The organisation will make available Subject Access Request (SAR) forms so that a person is able to alter/request deletion of their associated data from its systems

### Archiving/removal

- a. To ensure that personal data is kept for no longer than necessary, the organisation shall put in place an archiving policy for each area in which personal data is processed and review this process annually
- b. The archiving policy shall consider what data should/must be retained, for how long, and why

### Retention

- a. Customer data on tickets.com/AdmitOne is subject to the Privacy Policies of those organisations or until the individual requests deletion through our organisation/our ticketing partners
- b. Customer data on Mailchimp is removed after 3 years of inactivity or until the individual requests deletion

- c. Applicant/guest data on Eventival/OneDrive is removed after 5 years of inactivity or until the individual requests deletion
- d. All other records such as financial, personnel, or recruitment related are destroyed every 7 years
- e. Data held on any other 3<sup>rd</sup> party systems is held as per that organisation's privacy policy

### Security

- a. The organisation shall ensure that personal data is stored securely using modern software and hardware that is kept-up-to-date and secured
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information
- c. When personal data is deleted this should be done safely such that the data is irrecoverable
- d. Appropriate back-up and disaster recovery solutions shall be in place

### Breach Notifications

It is the organisation's policy to be fair and proportionate when considering the actions to be taken to inform affected parties regarding breaches of personal data. In line with the GDPR, where a breach is known to have occurred which is likely to result in a risk to the rights and freedoms of individuals, the relevant Data Protection Commission (Ireland) will be informed within 72 hours.

Under the GDPR the Data Protection Commission (Ireland) has the authority to impose a range of fines of up to four percent of annual worldwide turnover or twenty million Euros, whichever is the higher, for infringements of the regulations.