



COMHAIRLE CONTAE ROS COMÁIN
ROSCOMMON COUNTY COUNCIL

Privacy Statement
Corporate Services Department

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1.0 Introduction

The role of the Corporate Services Department is to provide an effective and efficient support service to the Elected Members and Senior Management of Roscommon County Council and deliver general services to members of the public. It achieves this through providing the following services/functions:

- Organising and servicing meetings of the Council and its sub-committees, which includes support services to the Elected Members
- Register of Electors
- Insurances
- Customer Services
- Customer Complaints
- Freedom of Information (FOI)
- Data Protection and Data Governance
- Veterinary Functions
- Dog Control Services
- Control of Horses
- Safety, Health and Welfare at Work
- Civic Receptions and Events
- Ethics Register
- Disclosure of Donations
- Organising Domestic and Foreign Travel
- Dermot Earley Bursary Award
- Management of the Council's Social Media Account i.e. Facebook and Twitter
- Preparation of the Council's Annual Report
- Preparation of the Council's Corporate Plan
- Advertising in Newspapers
- Protected Disclosures
- Meetings Management System
- Meetings Webcasting System.

2.0 Purpose of Privacy Statement

The purpose of this privacy statement is to describe, in clear and concise terms, the personal data the Corporate Services Department may collect about individuals, why it is needed, how it is used and how individuals may interact with the Corporate Services Department in relation to their personal data. It also outlines the rights of individuals under data protection legislation in relation to the processing of their personal data.

3.0 Definitions

For the purposes of this privacy statement the following definitions apply:

- **Data Subject:** is an identified or identifiable natural person to whom personal data relates.
- **Personal Data:** 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.
- **Special Categories of Personal Data:** personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; genetic data; biometric data processed for the purpose of uniquely identifying a natural person; data concerning health and data concerning a natural person's sex life or sexual orientation.

4.0 Scope

This statement applies to all personal data processed by the Corporate Services Department in physical or electronic format. This data primarily relates to past, current and prospective activities of the Corporate Services Department.

5.0 Data Protection Policy

Roscommon County Council creates, collects and processes a significant amount of personal data in various formats on a daily basis.

It is the policy of Roscommon County Council that:

- It will seek to act at all times in full compliance with data protection legislation in its processing of personal data;
- GDPR principles are respected and strictly adhered to;
- The rights of data subjects are fully respected and protected;
- Measures exist to respond appropriately to personal data breaches;
- Appropriate governance mechanisms exist to oversee compliance with data protection legislation.

Roscommon County Council is fully committed to ensuring that the personal data processed by its Corporate Services Department is:

- Obtained lawfully, fairly and in a transparent manner;
- Obtained for only specified, explicit and legitimate purposes;
- Adequate, relevant and limited to what is necessary for the purposes for which it was obtained;
- Recorded, stored accurately and securely and where necessary kept up to date;
- Kept only for as long as is necessary for the purposes for which it was obtained;
- Kept in a form which permits identification of the data subject;
- Processed only in a manner that ensures the appropriate security of the personal data including protection against unauthorised or unlawful processing.

Roscommon County Council has developed a ***Corporate Data Protection Policy and Procedures*** which go in to more detail as to how it intends meeting these commitments.

6.0 What Personal Data is Processed

Details of personal data processed by each of the services/functions of the Corporate Services Department are contained in the following tables:

Table 6.1	
Service/Function	Personal Data Processed
Organising and servicing meetings of the Council and its sub-committees, which includes support services to the Elected Members	<i>Elected Members:</i> <ul style="list-style-type: none">• Name and address• Contact details i.e. telephone number, e-mail address• Passport details• Conferences attended including car registration number• Expenses claimed and paid• Details of election expenses

Table 6.2	
Service/Function	Personal Data Processed
Register of Electors	<i>Elector</i> <ul style="list-style-type: none">• Name and address including Eircode• Date of birth• Passport details• Category of voter• PPS Number <i>Fieldworker</i> <ul style="list-style-type: none">• Name• Address including Eircode• Phone Number• Email

Table 6.3	
Service/Function	Personal Data Processed
Insurances	<ul style="list-style-type: none"> • Name and address • Date of birth • Contact details i.e. telephone number, e-mail address • Details of the circumstances and nature of the claim • Medical records • Legal correspondence

Table 6.4	
Service/Function	Personal Data Processed
Customer Services	<ul style="list-style-type: none"> • Name and address • Contact details i.e. telephone number, e-mail address

Table 6.5	
Service/Function	Personal Data Processed
Customer Complaints	<ul style="list-style-type: none"> • Name and address • Contact details i.e. telephone number, e-mail address • Details of the circumstances and nature of the complaint

Table 6.6	
Service/Function	Personal Data Processed
Freedom of Information (FOI)	<ul style="list-style-type: none"> • Name and address of persons submitting FOI requests • Contact details i.e. telephone number, e-mail address • Details of records requested and released

Table 6.7	
Service/Function	Personal Data Processed
Data Protection and Data Governance	<ul style="list-style-type: none"> • Name and address of persons submitting Data Subject Access requests • Data Subject's contact details i.e. telephone number, e-mail address • Details of personal data requested and released

Table 6.8	
Service/Function	Personal Data Processed
Veterinary Functions	<p><i>Temporary Veterinary Inspectors:</i></p> <ul style="list-style-type: none"> • Name and address • Contact details i.e. telephone number, e-mail address • Bank account details • C2/tax clearance certificate/PPSN/tax reference number • Health and safety records • Insurance details <p><i>Slaughterhouses and Food Business Establishments:</i></p> <ul style="list-style-type: none"> • Name and address • Contact details i.e. telephone number, e-mail address • Bank account details • C2/tax clearance certificate/PPSN/tax reference number • Approval records • Inspection reports • Enforcement activity

Table 6.9	
Service/Function	Personal Data Processed
Dog Control Services	<p><i>Service Provider:</i></p> <ul style="list-style-type: none"> • Name and address of service provider • Contact details i.e. telephone number, e-mail address • Bank account details • C2/tax clearance certificate/PPSN/tax reference number • Health and safety records • Insurance details <p><i>Complaints:</i></p> <ul style="list-style-type: none"> • Name and address of complainants • Contact details i.e. telephone number, e-mail address <p><i>Dog licences:</i></p> <ul style="list-style-type: none"> • Name and address • Contact details i.e. telephone number, e-mail address <p><i>Dog Breeding Establishments:</i></p> <ul style="list-style-type: none"> • Name and address • Contact details i.e. telephone number, e-mail address • Approvals • Inspection reports • Enforcement activity • Public register

Table 6.10	
Service/Function	Personal Data Processed
Control of Horses	<ul style="list-style-type: none"> • Name and address of service provider • Name and address of complainants • Contact details i.e. telephone number, e-mail address

Table 6.11	
Service/Function	Personal Data Processed
Safety, Health and Welfare at Work	<ul style="list-style-type: none"> • Name and address • Date of birth • Contact details i.e. telephone number, e-mail address • Incident reports • Vaccination records • Training undertaken

Table 6.12	
Service/Function	Personal Data Processed
Civic Receptions and Events	<ul style="list-style-type: none"> • Name and address • Contact details i.e. telephone numbers, e-mail address • Bank account details • C2/tax clearance certificate/PPSN/tax reference number • Photographs

Table 6.13	
Service/Function	Personal Data Processed
Ethics Register	<ul style="list-style-type: none"> • Declarable interests of elected members and relevant staff including name, address and property interests.

Table 6.14	
Service/Function	Personal Data Processed
Disclosure of Donations	<ul style="list-style-type: none"> • Details of donations received • Bank account details

Table 6.15	
Service/Function	Personal Data Processed
Organising Domestic and Foreign Travel	<ul style="list-style-type: none"> • Name and address • Contact details i.e. telephone numbers, e-mail address • Passport details

Table 6.16	
Service/Function	Personal Data Processed
Dermot Earley Bursary Award	<ul style="list-style-type: none"> • Name and address • Date of birth • PPSN • Contact details i.e. telephone numbers, e-mail address • Bank details • Academic and social achievements

Table 6.17	
Service/Function	Personal Data Processed
Management of the Council's Social Media Account i.e. Facebook and Twitter	<ul style="list-style-type: none"> • Names and images

Table 6.18	
Service/Function	Personal Data Processed
Preparation of Council's Annual Report	<ul style="list-style-type: none"> • None

Table 6.19	
Service/Function	Personal Data Processed
Preparation of Council's Corporate Plan	<ul style="list-style-type: none"> • None

Table 6.20	
Service/Function	Personal Data Processed
Advertising in Newspapers	<ul style="list-style-type: none"> • None

Table 6.21	
Service/Function	Personal Data Processed
Protected Disclosures	<ul style="list-style-type: none"> • Disclosers name, address and contact details i.e. telephone number, e-mail address • Name, address and contact details of person or persons alleged to have carried out wrongdoing • Details of the circumstances and nature of the protected disclosure

Table 6.22	
Service/Function	Personal Data Processed
Meetings Management System	<ul style="list-style-type: none"> • Name • Address • Mobile phone number

Table 6.23	
Service/Function	Personal Data Processed
Meetings Webcasting System	<ul style="list-style-type: none"> • Name • Email address

7.0 Why Personal Data is Processed

7.1 Personal data is processed by the Corporate Services Department in order to carry out the functions of the department.

7.2 If the Corporate Services Department proposes to process personal data for a purpose other than it was obtained it will, prior to such processing, provide the data subject with information on that purpose and any other relevant information.

8.0 The Legal Basis for Processing Personal Data

8.1 Under Articles 6 and 9 of the GDPR, the processing of personal data requires a legal basis. The legal basis for the Corporate Services Department's processing of personal data includes any one or more of the provisions contained in these Articles and in particular any one or more of the following:

- Article 6(1)(a) of the GDPR where the data subject has given consent to the processing of his or her personal data for one or more specific purposes. Generally, the number of occasions whereby Roscommon County Council relies on consent for the processing of personal data is very limited. In such circumstances the data subject has the right to withdraw consent to the processing of his or her personal data at any time.

- Article 6(1)(c) of the GDPR where the processing is necessary for compliance with a legal obligation to which Roscommon County Council is subject.
- Article 6(1)(e) of the GDPR where the processing is necessary for the performance of a task carried out in the public interest or in the exercise of an official authority vested in Roscommon County Council.

8.2 *Appendix A* provides details of the full range of lawful conditions for which Roscommon County Council may process personal data under Articles 6 and 9 of the GDPR.

9.0 How Personal Data is Obtained

9.1 Most of the personal data collected by the Corporate Services Department is obtained directly from past, current and prospective members of the public, elected members, Roscommon County Council staff, contractors, suppliers, service providers, insurance companies, solicitors and medical profession.

9.2 The Corporate Services Department also creates personal data as a result of processing activities carried out by the services it provides e.g. dog control functions, control of horses, veterinary functions, insurance, health and safety, travel claims and expenses and customer complaints.

10.0 How Personal Data is Processed

The processing of personal data by staff within the Corporate Services Department is generally carried out by use of the following processes/systems:

- iReg System
- National Dog Register System
- Official Agency Premises and Inspections (OAPI) System - Food Safety Authority of Ireland

- Animal Identification and Movement System (A.I.M.S.) – Department of Agriculture, Food and the Marine
- Microsoft Word, Excel, PowerPoint and Outlook
- Manual files
- Mobile telephones (limited access).

11.0 Sharing Personal Data with Third Parties

The sharing of personal data with third parties will only occur in circumstances that are permitted by law. Details of the sharing of personal data by the Corporate Services Department with third parties are contained in the following tables:

Table 11.1	
Service/Function	Third Parties with whom Personal Data is Shared
Organising and servicing meetings of the Council and its sub-committees which includes support services to the Elected Member	All data outlined in Table 6.1 is publicly available with the exception of car registration details

Table 11.2	
Service/Function	Third Parties with whom Personal Data is Shared
Register of Electors	<ul style="list-style-type: none"> • Franchise Section, Department of Housing, Planning and Local Government • Local Government Management Agency • The Register of Electors is published as prescribed by legislation

Table 11.3	
Service/Function	Third Parties with whom Personal Data is Shared
Insurances	<ul style="list-style-type: none"> • Irish Public Bodies Insurance • County Solicitor • An Garda Síochána • Legal representatives • Rossiter Claims Management Services • Personal Injuries Board

Table 11.4	
Service/Function	Third Parties with whom Personal Data is Shared
Customer Services	<ul style="list-style-type: none"> • None

Table 11.5	
Service/Function	Third Parties with whom Personal Data is Shared
Customer Complaints	<ul style="list-style-type: none"> • Office of the Ombudsman in the event of an appeal

Table 11.6	
Service/Function	Third Parties with whom Personal Data is Shared
Freedom of Information (FOI)	<ul style="list-style-type: none"> • Information Commissioner in the event of an appeal

Table 11.7	
Service/Function	Third Parties with whom Personal Data is Shared
Data Protection and Data Governance	<ul style="list-style-type: none"> • Data Protection Commission in the event of a complaint

Table 11.8	
Service/Function	Third Parties with whom Personal Data is Shared
Veterinary Functions	<ul style="list-style-type: none"> • Food Safety Authority of Ireland • Department of Agriculture, Food and the Marine

Table 11.9	
Service/Function	Third Parties with whom Personal Data is Shared
Dog Control Services	<ul style="list-style-type: none"> • An Post • Service Provider

Table 11.10	
Service/Function	Third Parties with whom Personal Data is Shared
Control of Horses	<ul style="list-style-type: none"> • Department of Agriculture, Food and the Marine

Table 11.11	
Service/Function	Third Parties with whom Personal Data is Shared
Safety, Health and Welfare at Work	<ul style="list-style-type: none"> • Irish Public Bodies Insurance • Solicitors • Roscommon County Council's Occupational Health Consultant (vaccination records)

Table 11.12	
Service/Function	Third Parties with whom Personal Data is Shared
Civic Receptions and Events	<ul style="list-style-type: none"> • Print media • Social media

Table 11.13	
Service/Function	Third Parties with whom Personal Data is Shared
Ethics Register	<ul style="list-style-type: none"> Ethics Register available for public inspection

Table 11.14	
Service/Function	Third Parties with whom Personal Data is Shared
Disclosure of Donations	<ul style="list-style-type: none"> Register available for public inspection

Table 11.15	
Service/Function	Third Parties with whom Personal Data is Shared
Organising Domestic and Foreign Travel	<ul style="list-style-type: none"> Media subsequent to Freedom of Information requests and subject to provisions contained in Freedom of Information legislation

Table 11.16	
Service/Function	Third Parties with whom Personal Data is Shared
Dermot Earley Bursary Awards	<ul style="list-style-type: none"> Interview Board Print and social media - names and photographs of successful award recipients published

Table 11.17	
Service/Function	Third Parties with whom Personal Data is Shared
Management of the Council's Social Media Account i.e. Facebook and Twitter	<ul style="list-style-type: none"> Social media

Table 11.18	
Service/Function	Third Parties with whom Personal Data is Shared
Preparation of Council's Annual Report	<ul style="list-style-type: none"> • None

Table 11.19	
Service/Function	Third Parties with whom Personal Data is Shared
Preparation of Council's Corporate Plan	<ul style="list-style-type: none"> • None

Table 11.20	
Service/Function	Third Parties with whom Personal Data is Shared
Advertising in Newspapers	<ul style="list-style-type: none"> • None

Table 11.21	
Service/Function	Third Parties with whom Personal Data is Shared
Protected Disclosures	<ul style="list-style-type: none"> • None

Table 11.22	
Service/Function	Third Parties with whom Personal Data is Shared
Meetings Management System	<ul style="list-style-type: none"> • None

Table 11.23	
Service/Function	Third Parties with whom Personal Data is Shared
Meetings Webcasting System	<ul style="list-style-type: none"> • Public-i

12.0 Records Retention Policy

The Corporate Services Department will retain personal data only for as long as is necessary for the purposes for which it was obtained. Roscommon County Council has developed detailed ***Record Retention Policies*** which go into more detail regarding the time period for which personal data will be retained.

13.0 Data Subject Rights

Data subjects have a range of rights under GDPR. These include the following:

- The right to be informed;
- The right of access;
- Right to rectification of inaccurate or incomplete data;
- The right to erasure of personal data (also known as the ‘right to be forgotten’);
- The right to portability;
- The right to object to the processing of personal data;
- The right to restrict the processing of personal data;
- Rights in relation to automated decision making, including profiling.

Roscommon County Council’s ***Corporate Data Protection Policy and Procedures*** provide more detailed information on these rights and how to exercise them.

14.0: Complaints to the Data Protection Commission

14.1 Data subjects may make a complaint in the following circumstances:

- a) If they experience a delay outside of the prescribed timeframe for making a decision on a request to exercise their data subject rights;
- b) If they are dissatisfied with a decision by Roscommon County Council on their request to exercise their data subject rights;

- c) If they consider that Roscommon County Council's processing of their personal data is contrary to data protection legislation.

14.2 Contact details for the Data Protection Commission are as follows:

Phone Number: 01 7650100 / 1800 437737.

Postal Address: Data Protection Commission
21 Fitzwilliam Square South
Dublin 2
D02 RD28.

Online: www.dataprotection.ie provides details for online contact.

15.0 Monitoring and Review

Provisions contained in this statement shall be subject to on-going monitoring and review.

16.0: Further Information

Further information and advice on the operation of this privacy statement is available from the Data Protection Officer, Roscommon County Council. Contact details for the County Council's Data Protection Officer are as follows:

Phone Number: 090 6637100

E-mail: dataprotection@roscommoncoco.ie

Website: www.roscommoncoco.ie

Postal Address: Roscommon County Council
Áras an Chontae
Roscommon
F42 VR98

Appendix A: Lawful Processing Conditions

(a) Lawful Processing Conditions – Personal Data

Under Article 6 of the GDPR the processing of personal data is lawful only if at least one of the following conditions apply:

- 1) The data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- 2) The processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- 3) The processing is necessary for compliance with a legal obligation to which the controller is subject;
- 4) The processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- 5) The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller;
- 6) The processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party (Processor), except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. This condition shall not apply to processing carried out by public authorities in the performance of their tasks.

(b) Lawful Processing Conditions – Special Categories of Personal Data

Under Article 9 of the GDPR the processing of Special Categories of Personal Data is lawful only if at least one of the following conditions apply:

- 1) The data subject has given explicit consent to the processing of those personal data for one or more specified purposes;
- 2) The processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the Controller or of the data subject in the field of employment and social security and social protection;
- 3) The processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
- 4) The processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other non-profit-seeking body with a political, philosophical, religious or trade-union aim and on the condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects;
- 5) The processing relates to personal data which are manifestly made public by the data subject;
- 6) The processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
- 7) The processing is necessary for reasons of substantial public interest;
- 8) The processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services pursuant to contract with a health professional;
- 9) The processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices; or
- 10) The processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with the Regulation