



General Data Protection Policy

Garda Síochaná Retired Members’ Association (G.S.R.M.A)

General Data Protection Policy

This Data Privacy Policy is effective as and from 25 May 2018

1. Introduction

The General Data Protection Regulation, commonly referred to as ‘GDPR’, is effective from 25 May 2018 and is a new EU regulation which updates the approach and requirements regarding the capture and use of personal data by businesses and organisations. This new regulation is designed to harmonise data privacy laws across Europe and to protect citizens’ data privacy. It strengthens the current rules and governance requirements in relation to the personal data of individuals.

Data protection has always been a priority for us at Garda Síochaná Retired Members’ Association and keeping the data you entrust to us secure is a core part of our business. This new regulation is designed to increase the level of transparency in how personal data is managed and GSRMA wholeheartedly embraces this. To facilitate this, the GSRMA is reviewing its procedures and updating its approach to managing our members’ data, to ensure we fully reflect and embrace these new standards. To improve how we inform and communicate with our members in relation to data protection, we have drawn up this Data Privacy Policy which sets out in more detail how your data is treated and managed within the GSRMA to support the day to day provision of services for you.

The purpose of this Data Privacy Policy is to explain how Garda Síochaná Retired Members’ Association (the “GSRMA”, “we”, “us” and “our”) may process your personal information.

A Data Privacy Policy is a document that every organisation who controls and processes personal information must make available. This Data Privacy Policy (together with our Cookies Policy) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. It details how we collect, use, disclose, transfer and store your personal information.

This Data Privacy Policy may be updated from time to time and the current version of this Data Privacy Policy shall be displayed on our website. Such amendments will not be made retrospectively.

We will always comply with the General Data Protection Regulation ‘GDPR’ when dealing with your personal data. Further details on the GDPR can be found at Office of the Data Protection Commissioner’s dedicated GDPR website (gdprandyou.ie).

For the purposes of the ‘GDPR’, we will be the “controller” of all personal data which we hold about you. You can find our contact details at the end of this Data Privacy Policy.

If you are providing personal information on behalf of a third party, you must ensure that the third party receives a copy of this Data Privacy Policy before their personal information is shared with us (e.g. relatives of GSRMA members, solicitors).

2. Why do we collect and use your personal information?

We gather and process your personal information for a variety of reasons and rely on a number of different legal basis to use that information. For example, we use your personal information to process your membership application, to help administer your accounts and services, to ensure we provide you with the best service possible, to prevent unauthorised access to your account and to meet our legal and regulatory obligations, further details are set out in this document.

2.1 To comply with a legal obligation

We are required to process your personal information to comply with certain legal obligations, for example:

- to verify the personal information provided to us in order to meet our legal and compliance obligations;
- to keep records of communications;
- to administer our internal operational requirements;
- to communicate certain information to you such as providing notice of the AGM;
- to undertake systems testing, maintenance and development in order to ensure network and information security.

2.2 To enter into and perform a contract with you for the services which you require

In order to consider your application for membership of the GSRMA and to process any product/service applications you may make, we have to gather and process some personal information.

Examples of processing include the administration of membership. As part of this process, we may be required to pass some personal information to an intermediary or counter-party (e.g. GSRMA branch secretaries' membership report and Department of Justice and Reform)

2.3 To enable GSRMA to function as a business

In certain circumstances, we process your personal information on the basis of the legitimate interests of the GSRMA. In doing so, we ensure that the impact of the processing on your privacy is minimised and that there is a fair balance between the legitimate interests of the GSRMA and your privacy rights.

Examples of situations in which your personal information is processed based on our legitimate interests, include:

- 2.3.1 to keep records of communications and record telephone calls in order to evidence what has been discussed and keep a record of your instructions and to prevent or detect crime;
- 2.3.2 to perform research and analysis aimed at improving our products, services and technologies;
- 2.3.3 to inform you about new services or special offers we may introduce from time to time.

2.4 Where you have provided consent

We use your personal information to make you aware of products and services which may be of interest to you where you have consented to us doing so and in accordance with your preferences. You can at any time withdraw that consent using the contact details below.

GSRMA House, 5 Harrington St. Dublin 8 – gsmahouse@gardaretired.com

3 What personal information we collect about you

The information we hold about you includes personal information which you give to us when you are applying for membership. It also includes personal information we collect automatically, for instance, your IP address, the date and time you access our services when you visit our website. The personal information we collect about you may include:

- home address, date of birth, full name, date of retirement, identification documents, Garda registration number, Garda pension number, Garda Rank, mobile number, telephone number, email address, signature.
- information we learn about you from the way you operate our services and use our website.

4 How the personal information is collected

We collect personal information from a number of sources, including:

- information we receive directly from you or from a person acting on your behalf;
- information that we gather from publicly available sources such as the Internet.

5 How we use Cookies

We may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies are small pieces of information, stored in simple text files, placed on your computer by a website. Cookies can be read by the website on your subsequent visits so that you can access information in a faster and more efficient way. The information stored in a cookie may relate to your browsing habits on the web page, or a unique identification number so that the website can “remember” you on your return visit. Generally speaking, cookies do not contain personal data from which you can be identified, unless you have separately furnished such information to the website. Some of the cookies we use are essential for the website to operate. For more information on how to manage cookies, including how to disable cookies please visit: www.aboutcookies.org.

6 How we use personal information for direct marketing

From time to time, we would like to make you aware of other services that we offer which may be of interest to you. We can do this by using some of the personal information we hold about you. You have a right not to receive such information. You can make changes to your marketing preferences at any time by contacting us in writing at the address below.

GSRMA House, 5 Harrington St. Dublin 8 – gsmahouse@gardaretired.com

7 Who we share your personal information with

We share your personal information with trusted third parties who perform important functions for us based on our instructions and apply appropriate confidentiality and security measures, for example:

- a. our professional advisers such as consultants and auditors;
- b. Department of Justice and Reform;
- c. any sub-contractors, agents or service providers engaged by GSRMA (including their employees, directors and officers), such as back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions;
- d. GSRMA Branch Secretaries and Central Committee members.
- e. Distributors of GSRMA Magazine Siocháin.

We may also share your personal information with any third parties to whom you have instructed us to share your information with.

The people and organisations that we may share your personal information with may be located in a country that does not have data protection laws which provide the same level of protection as the laws in Ireland. Some countries already have adequate protection for personal information under their applicable laws. In other countries safeguards will be applied to maintain the same level of protection as the country in which the products and services are supplied. These safeguards may be contractual agreements with the overseas recipient or it may require the recipient to subscribe to international data protection frameworks. For more information about the European Commission’s decision on the adequacy of the protection of personal information in countries outside the EEA, please visit: https://ec.europa.eu/info/law/law-topic/data-protection_en

8 Is providing your personal information obligatory?

We are unable to enter into or administer the relationship with you without some personal information about you. In cases where providing your personal information is optional we will make this clear. In particular, it is not mandatory that our members sign up to receive marketing communications.

9 Updates to your personal information

If any of the personal information you have given to us should change, such as your contact details, please inform us without delay. Similarly, if we have collected personal information about you that you consider to be inaccurate, please inform us. Our contact details are:

GSRMA House, 5 Harrington St. Dublin 8 – gsmahouse@gardaretired.com

10 How long we keep your personal information for

We need to keep/store your personal information for as long as necessary to fulfil the purposes for which it was collected (as described above)

11 Your rights under data protection laws

You have several enhanced rights in relation to how we use your information including the right to:

- be informed how we use your personal information, access your information and receive copies of your information;
- request that inaccurate/incomplete information is corrected and updated;
- in certain circumstances have your information deleted or our use of your data restricted;
- withdraw consent at any time where processing is based on consent. If you withdraw your consent, it will not affect the lawfulness of processing based on your consent before it is withdrawn;
- exercise the right to data portability (e.g. obtain a copy of your information which we hold and transfer to another provider);
- object to use of your personal data for direct marketing purposes.

In addition, you have the right to complain to the Office of the Data Protection Commissioner which has enforcement powers and can investigate compliance with data protection laws. If you wish to exercise any of these rights you can contact us using the details below.

12 Updates

This Data Privacy Policy may be updated from time to time and the current version of this Data Privacy Policy shall be displayed on our website.

How to contact us

If you have any questions about this privacy notice or your personal information, please contact:

Data Protection Administrator, GSRMA House, 5 Harrington St. Dublin 8 or gsmahouse@gardaretired.com

