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General Data Protection Regulation (GDPR)

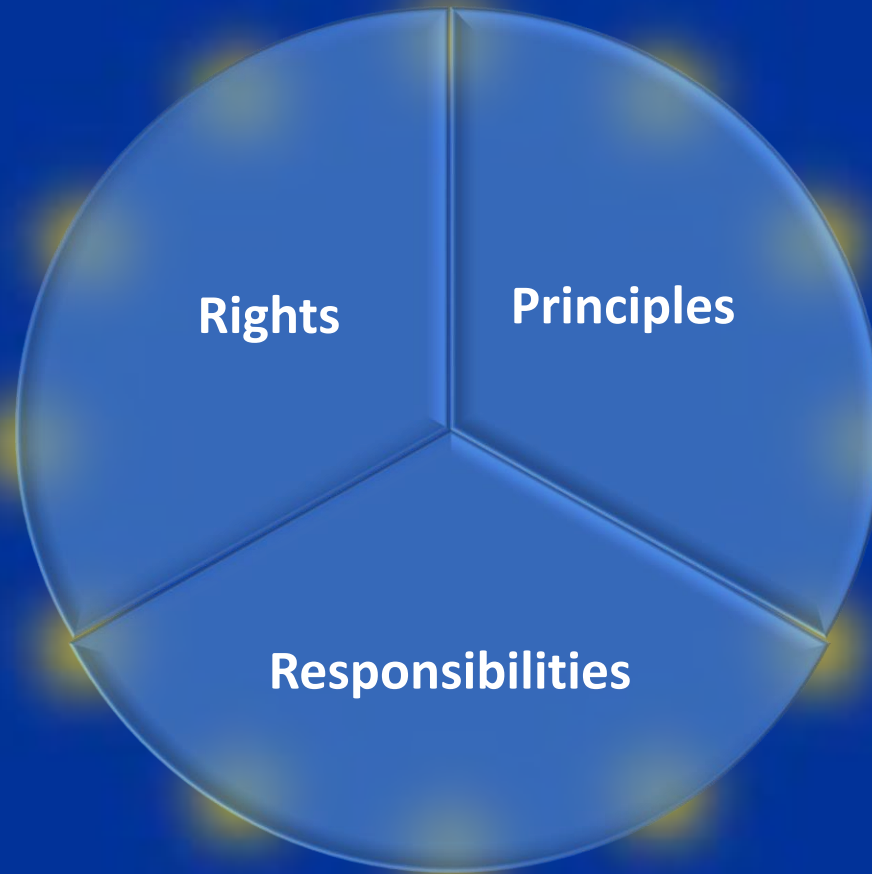
19th February 2018

At a glance

- Effective 25th May 2018.
- Extra-territorial.
- Single legislation for all EU member states, almost!
- Imposes stricter regulations on any organisation with access to EU personal data.
- Provides greater clarity for organisations.
- More aggressive enforcement mechanisms.



What do I need to know?



How can I process personal data lawfully?

Consent

Formation of a contract

Statutory obligation

Vital interest

Public interest

Legitimate Interest *

*not applicable to public bodies in the performance
of their tasks



Other requirements for processing

Specified, explicit and
legitimate*

Transparency

Retention

Minimisation

Security, Integrity and
confidentiality

Accuracy

Accountability

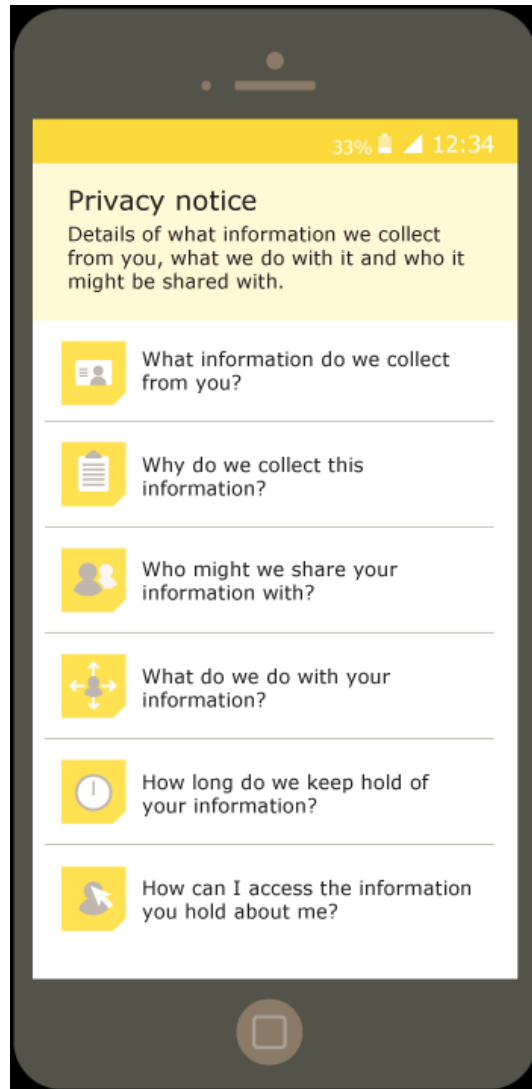


Valid consent

- The request should be intelligible and easily accessible and separate from other matters.
- The data subject must be informed of their right to withdraw consent.
- Must be freely given.
- When the processing has multiple purposes, consent should be given for all of them.
- The data subject must be informed of their right to withdraw consent.



Transparency



Privacy policy

Retail is part of Retail Group plc which includes Retail International and Retail Direct. This privacy policy explains how we use any personal information we collect about you when you use this website.

Topics:

- [What information do we collect about you?](#)
- [How will we use the information about you?](#)
- [Marketing](#)
- [Access to your information and correction](#)
- [Cookies](#)
- [Other websites](#)
- [Changes to our privacy policy](#)
- [How to contact us](#)

What information do we collect about you?

We collect information about you when you register with us or place an order for products or services. We also collect information when you voluntarily complete customer surveys, provide feedback and participate in competitions. Website usage information is collected using cookies.

How will we use the information about you?

We collect information about you to process your order, manage your account and, if you agree, to email you about other products and services we think may be of interest to you.

We use your information collected from the website to personalise your repeat visits to our website. If you agree, we shall pass on your personal information to our group of companies so that they may offer you their products and services.

Retail PLC will not share your information for marketing purposes with companies outside the Retail Group.

In processing your order, we may send your details to, and also use information from credit reference agencies and fraud prevention agencies.

Marketing

We would like to send you information about products and services of ours and other companies in our group which may be of interest to you. If you have consented to receive marketing, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes or giving your information to other members of the Retail Group.

If you no longer wish to be contacted for marketing purposes, please [click here](#).

Access to your information and correction

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please [email](#) or write to us at the following [address](#). We may make a small charge for this service.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity.

For further information visit www.aboutcookies.org or www.allaboutcookies.org.

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result.

Other websites

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 25 July 2016.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

- [by email](#)
- or write to us at: Retail Group, Privacy Team, Main Road, Town.

How to process special categories of data?

Special Categories of Personal Data

Health & Genetic

Racial & Ethnic

Sexual

Religious and Philosophical

Political

Biometric

Trade Union

Children's data

Criminal Convictions



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Conditions for processing special categories

A lawful basis plus one of the following -

- Explicit Consent
- Employment, Social Protection law
- Vital interests
- Legitimate activities by a foundation or not for profit re its members
- Public data
- Legal claims
- Substantial public interest
- Medical or Public Health
- Scientific research or archiving in the public interest



What rights do individuals have ?

Notification

Access

Erasure

Rectification

Portability

Profiling

Automated decisions

Restrictions*



Exemptions for Research

To facilitate scientific and historical research.

- Right of access.
- Right of rectification and restriction.
- Right to object to processing.*

“if the rights render impossible or seriously impair the achievement of the specific purposes ” and “derogations are necessary”.

*where processing is based on legitimate interest or public interest



Exemptions for Research

To facilitate scientific and historical research.

- Further processing “shall not be considered to be incompatible with the initial purposes”.
- Right to be forgotten i.e. “personal data may be stored for longer periods”.

“in accordance with Article 89”

“implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ”



Conditions for Exemptions in Art 89

Exemptions can only be availed of if technical and organisational safeguards are implemented which respect the principle of data minimisation:

- technical and organisational measures;
- Pseudonymisation and anonymisation;
- Comply with other legislation e.g. Regulation (EU) No 536/2014 re clinical trials;

Assess each scenario in context with a DPIA.



What other responsibilities are there?

Records of Processing

Data Processors

Processing Agreements

Data Transfers outside EEA

Data Breach Reports

Data Protection by Design

Data Protection Impact
Assessments

DPO



Records of Processing



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4. Personal Data Processing

4.1 Personal Data Inventory

List the activities in the unit that involve the processing of personal data and describe the purpose for processing the data, the types of data processed and who the data is processed about?

Activity	Purpose of processing	Legal Basis e.g. Consent	Data Subjects	Types of Data	Systems Used



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Data Protection Impact Assessment

A DPIA is mandatory:

- when the processing, is likely to result in a high risk to the rights and freedoms of natural persons;
- when carrying out automated processing or profiling, processing sensitive personal data or data relating to vulnerable individuals;
- carrying out monitoring of a public area on a large scale.

It is particularly relevant when a new data processing technology is being introduced.



Data Protection Impact Assessment

Questions

Responses



Data Protection Impact Assessment

The purpose of a Data Protection Impact Assessment is to determine if the concept of 'privacy by design' is adequately embedded into processes, systems or projects that will affect or bring about high risk or high volume processing of personal data.

The following should be considered prior to and during any activity or project which involves the processing of personal data:

- Only collect personal data that is necessary;
- Build data retention capability into any new systems processing personal data;
- Build information security into any new systems processing personal data;
- Identify any critical or sensitive data and apply proportionate security measures;
- Anonymise data where the identity of the individual is not required for the processing;
- Ensure data privacy training relevant to the new system or process is provided;
- Ensure personal data is readily accessible and data subject rights are supported;
- Include an audit trail to ensure the integrity of personal data.



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GDPR Guidance

Data Protection Toolkit
Data Protection Manual
Data Protection Manual for Researchers
Privacy Statement Template
Privacy Statement Procedure
Do I need a DPIA questionnaire
Privacy Impact Assessment Procedure
Privacy Impact Assessment Template
Subject Access Request Procedure
Subject Access Request Template
Breach Notification Procedure
Breach Notification Report Template
Consent Procedure
Sample Consent Template
Consent Procedure for Researchers
Parental Consent Template
Data Sharing Protocol
Data Processing Agreement Template
FAQs



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Questions?

