



Privacy Notice – Applicants, employees and former employees

Purpose of this Privacy Notice

This Privacy Notice serves to meet the obligations of your right to be informed under the General Data Protection Regulation (GDPR) 2018 which requires that data controllers provide data subjects with privacy information.

Positive Futures is a data controller meaning the organisation determines the purposes and means of processing personal data held about you. A data subject is an identifiable and living individual to whom personal data relates.

Processing personal information involves obtaining, recording, holding or carrying out any operation or set of operations including:

- organisation, adaptation or alteration
- retrieval, consultation or use
- disclosure by transmission, dissemination or otherwise making available
- alignment, combination, blocking, erasure or destruction.

The categories of personal data obtained

Personal data is any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier e.g. name, identification number, location data or online identifier. Positive Futures processes the following¹ personal data about applicants, employees and former employees²:

- Name
- Home address
- Email addresses (personal and work)
- Contact numbers (personal and work)
- Photograph
- Employee ID number
- Personal Public Service (PPS number) / National Insurance number
- Copies of ID documents
- Emergency contacts' details (name, relationship to employee, address, contact number and email address).

Special category personal data (sensitive personal data) attracts additional protection and includes race, ethnic origin, political opinions, religion, trade union membership, genetics, biometrics (where used for ID purposes), health, sex life and

¹ This list is not exhaustive.

² Please also note that not everything from this list will apply to all applicants, employees and former employees.



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sexual orientation. Positive Futures processes the following³ special category data about you⁴:

- Family, lifestyle and social circumstances information such as:
 - beneficiaries' details in relation to life assurance or other benefits
 - medical history
 - occupational health reports
 - nationality
 - criminal records
 - copies of documents which prove eligibility to work in Ireland / immigration status
- Employment-related information such as:
 - job title (current and previous)
 - training records, expense records (including details of out of pocket expenses, details of private cars etc)
 - work history
 - education
 - records of Garda checks
 - details of membership of professional bodies
 - details of any workplace accidents, exit interviews, reference / statutory information (including mortgage and employment references and forms from government departments)
 - any investigations relating to performance, conduct, violations of law or breaches of company policies
- Benefit-related information such as:
 - pay and benefits
 - bank details
 - pension details, where appropriate
 - sickness records and certificates and other documents required for other benefits, such as information relating to pregnancy and age of children etc. where applicable
- Employee communication monitoring information i.e. phone, written and electronic communications and records of these
- Information about use of our systems such as the use of our ICT systems and use of electronic devices used by or allocated to staff.

Your data is held securely in files in our offices, on our computer systems and in our archiving facility.

³ This list is not exhaustive.

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The source of the personal data, details of whether you are under a statutory or contractual obligation to provide the personal data and the retention periods for the personal data

We obtain this data from you during the recruitment process and pre-employment checks⁵. Recruitment agencies may also send us data about you on your behalf. If you are employed by us, we will obtain more data about you in the course of your employment.

If you leave our employment, we will hold records that contain your data for no longer than is necessary, as per the retention periods specified in our Records Retention and Disposal Schedule (RRDS).

Purposes of processing

Processing your data allows us to:

- Hire and recruit suitable staff and carry out required pre-employment checks
- Establish, perform, manage and terminate the employment contract, as appropriate
- Communicate with employees regarding work-related matters
- Communicate with employees' emergency contact/s in the event of an emergency, or suspected emergency
- Manage workplace investigations, disciplinary action and grievances
- Manage attendance, performance, development and training
- Manage professional travel and expenses
- Administer and manage payroll and benefits
- Ensure compliance with the requirements of professional bodies, regulatory authorities and Health Service Executive and The Child and Family Agency (TUSLA)
- Provide and manage our ICT systems and infrastructure
- Ensure compliance with our policies, procedures and applicable laws (including monitoring communications).
- Provide upon request employment references

Lawful basis for processing and the legitimate interests for the processing

Positive Futures process your data for the purposes of legal compliance, in order to fulfil our contractual obligations to you and because we have a legitimate interest in processing your data in order to recruit, manage and develop suitable staff.

⁵ You are under certain statutory and contractual obligations to provide us with your data.

The rights available to individuals in respect of the processing

Depending on the purpose and legal basis for processing your data you will have different rights. Under the GDPR, some of your rights are ‘qualified’ meaning there may be circumstances where some of your rights do not apply.

- You may have the right to access to your data. You can do so by submitting a Subject Access Request Form (available on our website) or by speaking to your Line Manager
- You may have the right to have your data erased
- You may have the right to have the processing of your data restricted
- You may have the right to have your data rectified if it is incorrect or completed if it is incomplete
- You may have the right to data portability meaning you may obtain and reuse the data we hold about you for your own purposes across different services
- You may have the right to object to your data being processed.

The right to withdraw consent

We rely on your consent to be able to process photographic images of you for the purposes of PR & marketing. If you do not sign a Media Consent Form, we will not process images of you for the purposes of PR & marketing.

You have the right to withdraw your consent at any time and you can do so by speaking to your line manager.

The recipients or categories of recipients of the personal data

Arrangements under Section 65 of the Health Act 2007 determines that we have a legal requirement to share your information with the Health Information and Quality Authority (HIQA) for their audit purposes.

We may be also be required to share your data with other employees or external organisations for the purpose of fulfilling our legal, regulatory and contractual obligations or for the defence of or response to litigation.

Our sister company in Northern Ireland, Positive Futures, provide us with back office support services, so your data will be shared securely on a need to know basis with their employees in relevant departments such as Human Resources and Finance.



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At the application stage, your data is shared with the Human Resources (HR) department, recruitment panel and the relevant line manager of the position to which you are applying.

If you are employed by us, your data will be shared with the HR and Finance departments, your line manager and may also be shared internally on a need to know basis with other support departments.

We may be required to provide upon request employment references. We have a duty to the recipient to provide information that is true, accurate, fair and non-discriminatory.

Positive Futures use data processors who are responsible for processing your data on behalf of Positive Futures such as our HR system providers, archiving facility, training providers and payroll providers.

The details of transfers of the personal data to any third countries or international organisations

As detailed in the section titled “The recipients or categories of recipients of the personal data”, Positive Futures in Northern Ireland provide back office support in relation to your data in relevant departments such as Human Resources and Finance. On 28.06.21 the European Commission approved the flow of data from the EU (and EEA) to the UK. This is known as an Adequacy Decision and confirms that the EU has determined that UK data protection laws are robust enough to ensure the safe transfer of data.

The details of the existence of automated decision-making, including profiling

We do not process your data for the purposes of automated decision-making, including profiling.

The name and contact details of our organisation / representative / data protection officer

For further information, contact the Information Manager at:

- Positive Futures, 2b Park Drive, Bangor, Co Down, BT20 4JZ
- +44 28 9147 5720
- dataprotection@positive-futures.net
- www.positive-futures.ie/contact-us

The right to lodge a complaint with a supervisory authority



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You have the right to lodge a complaint with the Data Protection Commission (DPC) if you are concerned about Positive Futures' information rights practices. Visit www.dataprotection.ie/en/individuals/exercising-your-rights/raising-concern-commission or contact them on +353 1 765 0100