

 | Ampersand

Ampersand CMC Limited

GDPR
Data Protection Policy

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Director

 | Ampersand

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1. Ampersand CMC Ltd – Data Protection Policy

&|Ampersand - Who we are and what we do

We are an independent company that supports organisations in dealing with a range of issues, and we specialise in solving complex organisational problems.

Our work takes different forms and, depending on the assignment, we act as advisors, experts, arbitrators, mediators, investigators, facilitators, coaches and trainers.

The work we do which may involve us receiving personal information includes:

- Governance support, strategy development, operational and structural management, pay and career path policy and practices, and evaluations
- Arbitration, conciliation, evaluation, facilitation, investigation(s), mediation
- General Employee Relations, Industrial Relations, or HR support.
- Recruitment
- Coaching
- Training and Development

General Data Protection Regulations (GDPR) – our policy

This policy is about GDPR and sets out how we deal with personal information we receive about individuals in the course of our work. It is our policy to keep personal information to an absolute minimum, so that we have only the personal information we need to complete the assignment we have been asked to undertake.

Each individual has rights in relation to their personal information that we receive and or hold, including the right to object to us having and processing that information. We require that there is consent to personal information being given to us, and consent to us having personal information that we generate with or about an individual.

An individual is entitled to know what information we hold, to ask for copies and to withdraw their consent. If you have any questions or concerns, you can contact our Data Protection Officer who is responsible for the oversight of this data protection policy, as well as our wider ethical standards and policies.

Caroline McCamley

Data Protection Officer - &|Ampersand

6 Ashe Lane, Knocksedan Demesne

Swords

Co Dublin

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tel: 087 246 1356

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1. Why we collect personal information.

We collect your information if we need it for an assignment we are working on, and if it is in line with any relevant legal basis to our work. Your personal information is held securely by us. We are committed to limiting our requirement for personal information about individuals to only information that is necessary for the assignment we have been given. This will be known to you. We also use it to ensure that we can account for the work we do, if asked to do so. This is a legitimate interest in the proper management of our business.

We will ensure that you understand our requirements, and we will respect your rights and freedoms in relation to information about you. You can withdraw your consent to our having or using any personal information at any time, by using the contact details on page three.

2. What information do we require and why?

This table sets out the type of personal information that we might require, and why we require it. There may be other information needed sometimes, but in every case, consent is required where personal information is shared with us.

The information we may need	Why we may need it
<ul style="list-style-type: none">Name, address, email address, telephone numbers	<ul style="list-style-type: none">To carry out a task or service and keep in contact, and for identification.
<ul style="list-style-type: none">Role, occupation, job descriptionInformation about work performanceInformation about disciplinary issuesInformation about complaints or grievancesInformation about conflictsIncome detailsPerformance, reference, medical or other reports	<ul style="list-style-type: none">To carry out tasks or a service that we have been contracted to provide, and to which you have consented to take part. <p>For example, to provide advice, in job or pay evaluations, mediation or arbitration cases, conciliation processes, investigations, recruitment, coaching or training.</p>

3. How do we use your data?

We make use of personal information to carry out the assignment, and in reports where that is required.

4. When would we share your personal information?

From time to time, a task may require that we engage a third party. When this happens, your consent will have been sought for that third party to receive the relevant personal information. For example, this could be a person involved in a recruitment process with us, or another professional supporting the effective completion of the assignment.

The law may require that we provide your information to Government bodies, including, as examples, An Garda Síochána or Revenue. We have no discretion in these instances, as we must comply with the law.

5. What happens if we do not have the personal information we require?

We need personal information so that we can carry out a legitimate task or assignment. This means that if we do not receive the information we need or we don't have your consent to receive it, we may not be able to carry out or complete the task.

6. Transferring information outside the European Economic Area

We do not transfer information outside Ireland unless instructed to do so by a client and with your permission. If instructed, we would only do so to countries with the same data protection legislation. These include the countries in the EEA (the EU, Iceland, Liechtenstein and Norway), and the UK. The UK remains covered by the same Data Protection legislation during the Brexit transition period.

7. What happens to personal information when a task is completed?

Generally, we only keep information that we are required to have to satisfy a legal, accounting or reporting requirement. As far as is practicable, we do not keep personal information after the assignment is completed. We return paper-based information to the original source, and we permanently delete electronic files. If we must keep information, we will tell you that, at any time, you can withdraw your consent to our holding information, except information the law requires us to hold.

8. What are your Data Protection Rights?

You have rights in relation to the information we hold about you. These rights are set out in the Data Protection legislation. In summary, you have the right to:

1. Request a copy of the personal information we hold
2. Review and correct inaccurate personal information
3. Erase personal information
4. Restrict processing of your personal information
5. Object to us using your personal information for our legitimate interests
6. Receive your personal information in a structured and commonly used accessible format
7. Have your information transmitted to another data controller

The Data Protection legislation may limit these rights, but your rights in general and how to access them is explained on the Data Protection Commission's site:

www.dataprotection.ie/docs/A-guide-to-your-rights-Plain-English-Version/r/858.htm

If you wish to exercise your rights in relation to the information we hold, please contact us. We will respond as quickly as possible, including advising you on when you can expect a response. We will certainly meet our obligations under the General Data Protection Regulation (GDPR). You have the right to lodge a complaint with the Office of the Data Protection Commission.

9. What happens when we update our Data Protection Policy?

This Data Protection Statement is reviewed at least every year. It is also reviewed every time the legislation changes, or if the Data Protection Commissioner issues new guidance. When we update it, the policy will be on our website, and we will notify our client and you of the update, if it happens during an assignment.

/ends

2. Information for clients

Our Data Protection Policy sets out how we manage information of a personal nature which we require for an assignment. The following is the Ampersand protocol in relation to information you supply to us in documents, emails or other materials.

Relevant information: Contact information and documentation supplied should only contain material relevant to work that we have been asked to do, and no personal information should be included without the relevant required consent/s. We will return data unrelated to the assignment to you or delete it permanently from our system.

Consent: Before you send personal information to us, you must confirm that you have consent from the person in question for Ampersand to receive, hold and use the information supplied.

Use of data: The information Ampersand holds is used only for the work we are doing with clients. It is never used for other purposes, nor is it shared with third parties without written consent from you our client, and consent from the person concerned.

Retention and disposal of data: We hold information you give us securely. When assignments are completed, we return the information to you or permanently delete, whichever you instruct us to do. We only retain material we must keep for legal or business purposes.

3. Consent Forms

In this section, there are two Consent forms:

Consent Form A – the standard form, to be completed by the person whose personal information will be shared with us before an assignment begins and if consent has not been arranged by the client.

Consent Form B – the form to be completed by the person whose personal information will be shared with us, where consent for additional information is required during an assignment.

Consent Form A

Sharing specific personal data with Ampersand CMC Ltd

Data protection legislation provides for the sharing and processing of personal data in certain circumstances. The person concerned must give their consent. That consent may be withdrawn.

I, _____, of _____

confirm that I have read the information provided about my rights under data protection legislation. I understand how to exercise those rights in relation to the data that I am consenting here to being shared.

I confirm that I have received, read and understood a copy of the **Terms of Reference** describing the service to be provided.

I am giving consent to the person or people named here:

- HR Department/Manager *[name]* _____
- my Employer/Line Manager *[name]* _____

to provide [the Ampersand Consultant, *[name]* _____ Ampersand CMC Ltd, of 6 Ashe Lane, Knocksedan, Swords, Co Dublin with my personal information. This will include my name, contact details and other information about my employment situation to _____ and as detailed in the Terms of Reference.

I confirm that I have received a copy of this Consent Form.

Your signature: _____	Date															
	<table border="1"><thead><tr><th>D</th><th>D</th><th>M</th><th>M</th><th>Y</th><th>Y</th><th>Y</th><th>Y</th></tr></thead><tbody><tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr></tbody></table>	D	D	M	M	Y	Y	Y	Y							
D	D	M	M	Y	Y	Y	Y									

Consent Form B

Where additional specific personal data is being shared with Ampersand CMC Ltd

Data protection legislation provides for the sharing and processing of personal information in certain circumstances. The person concerned must give their consent. That consent may be withdrawn.

I, _____, of _____
confirm that I have already given consent to the sharing of personal information [*in my Consent Form dated _____*].

For this assignment, I am now consenting further to:

- The following additional information being shared by [name, role and organisation] with Ampersand CMC Ltd [name of Ampersand Consultant]:

I confirm that I have received a copy of this Consent Form.

Your signature: _____	Date							
	D	D	M	M	Y	Y	Y	Y