



Data Protection Policy

Introduction

WIT Diverse Campus Services Limited (herein after referred to as DCS) and/or its associated companies ("us" or "we") have created this privacy statement to demonstrate its firm commitment to safeguarding the privacy rights of individuals in relation to the processing of their personal data. The following is a full description of our information gathering and dissemination practices for DCS ("the site"). It sets out the way in which any personal data which we collect from individuals, or is provided to us, will be processed used and protected by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By using this site, you consent to the collection, use and transfer of your information under the terms of this Privacy Agreement.

For the purpose of the Data Protection Act 1988 and the Data Protection (Amendment) Act 2003 (together 'the Data Protection Acts'), the data controller is DCS having its principal place of business at WIT, Cork Road Waterford, Ireland.

Purpose of this Policy

This policy is a statement of the DCS commitment to protect the rights and privacy of individuals in accordance with the Data Protection Acts.

Access to this policy

This policy is available on the DCS Website: www.witcampusservices.ie

Collecting Information

The purpose for which personal data is collected and used in DCS includes:

- The provision of a student ID card for all students attending WIT in accordance with the official register of current students.
- the provision of a staff ID cards for both WIT and DCS staff
- the provision of a Sports Campus ID cards for members of the public
- the provision of a cashless payment system for the College services
- the provision of an access control system using the card system
- advertising, marketing, direct marketing and public relation exercises
- accounting and other record-keeping functions
- the provision of summer business courses and programmes
- the provision of summer camps
- the provision of Accommodation Services
- the provision of Sports Campus programmes
- the provision of catering and social events

- collection of Dome Sports & Social Club membership
- to enhance or improve your experience on our website, kiosks and web portals
- the provision of online services. Each service has different information requirements. Therefore the information we need, and what it is needed for, can differ. For full details please refer to the terms and conditions for each service.
- the provision of Fitness Suite classes and programme memberships
- the recruitment and payment of staff
- compliance with statutory obligations

Data Protection Principles

We shall perform our responsibilities under the Data Protection Acts in accordance with the following eight Data Protection principles:

1. **Obtain and process information fairly**
DCS shall obtain and process your personal data fairly and in accordance with statutory and other legal obligations.
2. **Keep it only for one or more specified, explicit and lawful purposes**
DCS shall keep your personal data for purposes that are specific, lawful and clearly stated. Your personal data will only be processed in a manner compatible with these purposes.
3. **Use and disclose only in ways compatible with these purposes**
DCS shall use and disclose your personal data only in circumstances that are necessary for the purposes for which we collected the data.
4. **Keep it safe and secure**
DCS shall take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of your personal data and against its accidental loss or destruction.
5. **Keep it accurate, complete and up-to-date**
DCS adopt procedures that ensure high levels of data accuracy, completeness and that your data is up-to-date.
6. **Ensure it is adequate, relevant and not excessive**
DCS shall only hold your personal data to the extent that it is adequate, relevant and not excessive.
7. **Retain for no longer than is necessary**
DCS have a retention policy for your personal data.
8. **Give a copy of his/ her personal data to that individual, on request**
DCS adopt procedures to ensure that data subjects can exercise their rights under the Data Protection legislation to access their data.

Responsibility

DCS has overall responsibility for ensuring compliance with Data Protection Acts. However all employees and contractors of DCS who separately collect, control or process the content and use of personal data are individually responsible for compliance with the Data Protection Acts.

The Company provides support, assistance and advice throughout the company to ensure that they are in a position to comply with the legislation.

Procedures and Guidelines

DCS is firmly committed to ensuring personal privacy and compliance with the Data Protection Acts, including the provision of best practices guidelines and procedures in relation to all aspects of Data Protection

Telephone Calls

DCS does not record the content of telephone calls. However a record is kept of all calls to, from and within the Institute. This record is made up of the telephone numbers and duration of the calls.

There is a voicemail service provided whereby people can leave messages for a member of staff when they are out of the office. The individual staff member has responsibility for deleting these messages. However messages

Company Websites

In general, you can visit the site without providing personal information. However, there may be times when we will request personal information in order that you may participate in the site's activities or features. Information is typically requested when you wish to contact us, request particular information, (the type of information we may require could include your name, contact details, credit or debit card information etc.) or register an interest in some of other services (for example, an Accommodation enquiry) available as part of our business. If you contact us, we may keep a record of that correspondence.

The personal information collected may include, but is not limited to, the following: name, e-mail address, address, age, country of residence, nationality, gender and/or chosen password to access certain parts of the site. In common with many other website operators, we may use standard technology called 'cookies' on the site. Cookies are small pieces of information that are stored by your browser on your computer's hard drive. We use cookies to tell us in what language the site should be presented to you, to improve the site and deliver a better and more personalised service. Most browsers automatically accept cookies, but you can usually change your browser setting to prevent cookies being stored. However, if you adjust your browser setting in this way, you may be unable to access certain parts of the site.

Please note that third parties advertising on our site may also use cookies, over which we have no control.

When you submit personal information to us through the site, you agree that your information may be stored, processed and used by and/or on behalf of us.

We may also collect information about your interaction with the site and the services on the site. This may include information about your computer and, where available, your IP address, operating system and browser type. In particular, we reserve the right to perform statistical analysis of user behaviour and characteristics in order to measure interest in and use of the various areas of the site and to ascertain the number of users that have visited particular web pages. We will provide only aggregated data from these analyses to third parties and this statistical data does not identify any individual.

DCS confirms that, in general, it will only use the personal information you provide within the site. Where we want to pass your personal information on to someone else, unless you have already and/or previously given us your permission to do so, we will tell you - refer to the notices on particular web pages that let you know why we are requesting your personal information and to whom it will be made available. The option will then be yours to submit your personal information or not.

We collect and use your information in order to give you a better service and to provide you with information you request including services provided to DCS. Your information is also used to fulfil your requests for certain services and/or to participate in certain activities provided by DCS. We

may also use your information to bill you and to contact you about an order/booking.

The personal information you provide may be used by us or our associated organisations to deliver the information or services you request, including but not limited to organisations such as WIT Fitness Suite. For example, if you request us to do so, we may contact you when special deals go on sale, a special event is taking place within our organisation or when our new sports leagues are open to new members. Your personal information is also used to contact you when necessary (for example, to contact winners of competitions or games and/or to confirm the contact details you have provided to WIT Sports Campus).

In order to access some services or parts of our sites, you may be asked to sign in with an e-mail address and to choose a password. In this case your chosen password and other information (including e-mail address) are collected and used to create a unique logon for you to access a particular part of the site (including to access and/or take advantage of certain services available on the site).

The websites site may contain links to other websites whose privacy and information practices may be different to ours. You should consult the other websites' privacy statements and/or notices. WIT DCS is not responsible or liable for the content or privacy policies of other websites to which we link to from time to time.

Marketing

You have the right to prevent marketing information being sent direct to you. If you would like to receive information from us, ensure that you tick the "opt in" box which appears where you are submitting your personal information.

Electronic Communications

We comply with the terms of the European Directive on Privacy and Electronic Communications (Directive 2002/58/EC)

Disclosure to Other People

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent. We will never sell or rent your details to a third party.

Children under 16

If you are under 16, you must obtain the approval of a parent or guardian before you send us any of your personal information (such as your name, e-mail address, home address, date of birth etc).

Security

We use physical, electronic, and managerial procedures to help safeguard the information we collect from you. We urge you to take precautions to protect your personal information. When you are on the Internet ensure to keep any passwords safe and make sure you use a secure browser.

CCTV

DCS operates security cameras for the safety of its patrons. The Images captured on these cameras are digitally recorded and stored in a secure facility. While CCTV is monitored by staff, the technical advisor and DCS Managers, it is not disclosed to any third party with the exception of An Garda Síochána in the case of a disclosure pursuant to Section 8 of the Acts (e.g. required for the purpose of preventing, detecting or investigating offences). See "Data Protection and CCTV Policy v1.0"

WITCard

DCS, provide a smart card solution for the WIT community via the WITCard office. Electronic records containing information about individual's are collected. As controllers of data we collect and use information to provide the following services in accordance with data protection guidelines:

- to provide a student ID card for all students attending WIT in accordance with the official register of current students.
- to provide staff ID cards for both WIT and DCS staff
- to provide a cashless payment system for the College services
- to provide an access control system using the card system
- to perform accounting and other record-keeping functions
- to undertake advertising, marketing, direct marketing and public relation exercises
- to enhance or improve your experience on our website, kiosks and web portals
- to provide you with online services. Each service has different information requirements. Therefore the information we need, and what it is needed for, can differ. For full details please refer to the terms and conditions for each service.

All employees and contractors of the WITCard team who separately collect, control or process the content and use of personal data are individually responsible for compliance with the Data Protection Acts. This Data Protection Policy is supplemented (and may be amended) by specific policies and procedures adopted within the WITCard office.

Changes to this Privacy Statement

We reserve the right to change our security and privacy policies at any time. Accordingly, if in doubt, we recommend that you check this page periodically in order to review our current policies.

Your rights to access, correct, modify and/or remove your personal information

You have the right to receive a copy of and/or access, correct, modify and/or remove the personal information that we hold about you.

If you wish to receive a copy of the personal information that we hold about you, you shall make a request in writing to the contact details set out below. We may charge a small fee towards the cost of administering any particular request you make for a copy of such personal information.

If you wish to access, correct or modify any personal information you have provided to us, you have the right to have such information corrected and/or modified. The appropriate method(s) for accessing, correcting and/or modifying your personal information are set out below:

a) depending on the sites or service you have used, you may have the ability to access, correct and/or modify your personal information online. In order to prevent your personal information from being viewed by others, you will be required to sign and/or log in with your credentials (for example, e-mail address and password);

or, alternatively

b) any request(s) to access, correct and/or modify your personal information shall be in writing and shall be directed to the contact details as set out below and shall include enough information to enable us to satisfy ourselves as to your identity and to process your request.

c) Sections 4 and 5 of the Data Protection Acts set out circumstances in which the right of an individual to obtain access to their personal records can be limited. This is necessary in order to strike a balance between the rights of the individual, on the one hand, and some important needs of civil society, on the other hand. For example, a criminal suspect does not have a right to see the

information held about him by An Garda Síochána, where that would impede a criminal investigation; and you do not have a right to see communications between a lawyer and his or her client, where that communication would be subject to legal privilege in court.

If you wish to have the personal information you provided to us removed and/or if you no longer wish for your personal information to be processed, stored and/or used, your request shall be in writing and shall be directed to the contact details as set out below and shall include enough information to enable us to satisfy ourselves as to your identity and to determine the personal information you request to be removed.

If you have any questions about this privacy statement you can contact us at the contact details as set out below.

Contact Details

You can contact us by writing to DCS at the address set out below.

This privacy statement is subject to change without notice.

The Data Compliance Officer
WIT Diverse Campus Services Ltd
The Courtyard, WIT, Cork Road, Waterford,
Ireland.

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Data Protection aims to protect individuals' right to privacy with regard to the processing of their personal data by those who control such data. The legislation governing this is the Data Protection Acts 1988 and 2003. These acts lay down rules about the safeguarding of the privacy of personal data, covering such areas as the obtaining, processing, keeping, use, disclosure, accuracy, appropriateness, retention and an individual's right to access and correct their personal data. The legislation applies to personal data held in both manual and electronic format. For more on data protection please visit www.dataprotection.ie.