

## Early Years – Core Funding Grant Privacy Policy to be Shared with Service Provider Staff

To apply for the new Core Funding Grant, your employer has shared your personal data with the Department of Children, Equality, Disability, Integration and Youth (DCEDIY or 'The Department'), and Pobal, the body appointed to administer the Core Funding Scheme.

The Department, along with your employer, are 'Data Controllers' of this personal data (referred to as 'we' or 'us'). That means, we make decisions about how your personal data is used and processed as part of the Core Funding Grant programme. To do this lawfully under the Data Protection Acts, we have contracts in place which strictly define how and for why we use your data.

The Core Funding Application Portal (where this information is stored) is administered by Pobal, which is designated as scheme administrator for a range of childcare and other Departmental schemes, including the National Childcare Scheme, by the Minister for Children, Disability, Equality, Integration and Youth. While primary decisions regarding control of your data rests with the Department as data controller, Pobal acts as a data processor and is responsible for processing your personal data on behalf of the DCEDIY. Pobal acts as 'Data Processor' of your personal data and does so on behalf of the Department, under contract.

<b>DCEDIY's Contact Information is:</b>  <b>Address:</b> Block 1, Miesian Plaza, 50-58 Baggot Street Lower, Dublin 2 <b>Phone:</b> <a href="tel:+35316473000">+353 1 6473000</a> <b>Email:</b> <a href="mailto:dpocontact@equality.gov.ie">dpocontact@equality.gov.ie</a>	<b>Pobal's Contact Information is:</b>  <b>Address:</b> Holbrook House, Holles St, Dublin 2 <b>Phone:</b> <a href="tel:+35301511700">+353 01 511 700</a> <b>Email:</b> <a href="mailto:dataprotection@pobal.ie">dataprotection@pobal.ie</a>
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### Data We Process

The types of personal data your employer has shared with us may include the following:

- Name – first name, surname, previous surname if applicable.
- Degree, awarding body, date of award.
- Place of employment.
- Role in service provider facility.
- Hourly pay rate.
- Hours of work.
- Number of years working in the sector.

Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### Our Processing Purposes (Why We Need to Process Your Personal Data)

The personal data we process is for the purposes of implementing and maintaining the Core Funding programme as part of the National Childcare Scheme and the Childcare Act 1991. Staff details are necessary to properly calculate the amount of funding your employer receives under the Core Funding programme. Additionally, your employer and the Department may need to collect and process this information to comply with other legal obligations, such as the Equal Status Acts 2000-2015.

## Who we Share Personal Data With (Including Transfers Outside of the EU)

The Core Funding Application Portal (Hive) uses Microsoft Dynamics 365, which is stored on government servers in Ireland. Your data will never leave the European Economic Area (EEA) and your privacy rights remain protected under the GDPR.

## How we Secure Your Personal Data

We take all reasonable steps to ensure that your personal data is stored and processed securely and take appropriate security measures to protect against unauthorised or accidental access alteration, disclosure, or destruction of your data. Your employer has also signed a Core Funding Partner Service Funding Agreement with the Department pledging to secure personal data.

Should your data be damaged, lost, disclosed, or processed unlawfully in any way that poses a risk to you (a 'data breach'), we will notify the Data Protection Commission within 72 hours of becoming aware of the breach, and will notify you without delay if we believe any high level of risk to your rights and freedoms exists.

## How we Store and Retain Your Personal Data

Your personal data is hosted in data centres owned by Revenue and the Department of Agriculture, Food and the Marine in the Republic of Ireland.

Your personal data will be retained for as long as is necessary to fulfil the lawful purposes for which it was obtained, or for as long as the Department or your employer are legally obliged to do so in order to comply with our legal obligations (such as the National Archives Act 1986). Your employer may store your personal data separately, and they should provide you with information on how they do so, and how long your data is maintained by them.

## Your Rights as a Data Subject

You may exercise your rights either directly with your employer, or via the Department (both referred to as 'we' or 'us' below). You have the following data subject rights:

- **Right of Access:** You can make a formal request for a copy of your personal data being processed by us as part of the Core Funding Scheme. There is no fee for such a request, although a fee may be charged for excessive or repetitive requests. A separate Departmental Data Subject Rights Policy provides further details. You can make a Subject Access Request by emailing [sar@equality.gov.ie](mailto:sar@equality.gov.ie) or by contacting your employer directly.
- **Right to rectification:** We are committed to holding accurate data, and will work with you to ensure that we rectify any data where inaccuracies have been identified.
- **Right to erasure (right to be forgotten):** If you send a request to us to exercise your right of erasure, we will carry out an assessment of whether the personal data can be erased, and communicate this to you.
- **Right to restriction of processing:** Where a request for restriction of processing in certain circumstances is received, we will assess whether the restriction can be applied, and communicate this to you.
- **Right to data portability:** Where we have collected your personal data by consent or by contract, you have a right to receive the data in a common, machine-readable format to give to another data controller. Exercising this right will depend on the technical feasibility of the request.
- **Right to object:** You have the right to object to the processing of your personal data in specific circumstances. When you make an objection, we will assess the request on its merits, and communicate this to you.
- **Rights relating to automated decision-making, including profiling:** You have the right not to be subject to a decision based solely on automated processing. While we do not perform automated decision-making on employees or personnel, the Department may rely on automated processing as part of your employer's NCS application. Review and appeals processes are in place.
- **Right to complain:** If you are unhappy with the service received, you are welcome to contact the Department's Data Protection Officer (DPO). You also have the right to

contact the Data Protection Commission directly. All relevant contact details are provided below.

- **Right to an effective judicial remedy:** You have the right to make a legal claim where you believe you have been affected by us and/or our processors not complying with relevant data protection obligations.

**The Data Protection Officer:**

If you have any questions or concerns about how we have handled your personal data, you can contact the Data Protection Officer of the Data Controller (DCEDIY) or Data Processor (Pobal) to have the matter investigated at the following email addresses:

DCEDIY: [dpocontact@equality.gov.ie](mailto:dpocontact@equality.gov.ie)

Pobal: [dataprotection@pobal.ie](mailto:dataprotection@pobal.ie)

**The Data Protection Commission:**

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can submit a complaint to the Irish Data Protection Commission:

<b>Data Protection Commission</b> 21 Fitzwilliam Square South Dublin 2 D02 RD28 Ireland	<a href="https://www.dataprotection.ie">https://www.dataprotection.ie</a> +353 578 684 800 09:15 - 17:30hrs (17.15 Friday)
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