

ICOT College Data Management Policy

1. Introduction

ICOT College is committed to managing personal data responsibly and in compliance with the General Data Protection Regulation (GDPR) (EU Regulation 2016/679) and the Irish Data Protection Act 2018. This policy outlines how ICOT College collects, uses, stores, protects, and disposes of personal data relating to its students, staff, prospective students, alumni, and other individuals.

2. Scope

This policy applies to all personal data processed by ICOT College, regardless of the format in which it is stored (ICOT Management System). It applies to all students, staff members, contractors, and any third parties who process personal data on behalf of ICOT College.

3. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person ('data subject').
- **Processing:** Any operation or set of operations which is performed on personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Data Subject:** The individual to whom the personal data relates.
- **Data Controller:** ICOT College, which determines the purposes and means of the processing of personal data.
- **Data Processor:** A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- **Data Protection Officer (DPO):** ICOT College's Data Protection officer is Shiam Rahman – shiam@icot.ie. ICOT Stores it's data in MySQL database an open-source **relational database management system (RDBMS)** that is widely used for storing, managing, and retrieving structured data. We control the system and the Backup from CPanel. It is a **web hosting control panel** that provides a graphical user interface (GUI) and automation tools to simplify website and server management. Also, data is managed by the IT department too. In Dublin, the IT Manager is Bruno Campos da Silva – Bruno.campos@icot.ie and in Cork the IT Manager is Wesley Lucas – weslleycork@icot.ie. All members have been successfully trained on –

Shiam Rahman – Data Protection Officer Training

Bruno Campos da Silva – General Data Protection Regulation (GDPR)

Wesley Lucas - General Data Protection Regulation (GDPR)

- **Data Breach:** A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

4. Principles of Data Processing

ICOT College adheres to the following principles when processing personal data:

- **Lawfulness, Fairness and Transparency:** Personal data will be processed lawfully, fairly, and in a transparent manner in relation to the data subject.
- **Purpose Limitation:** Personal data will be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- **Data Minimisation:** Personal data will be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- **Accuracy:** Personal data will be accurate and, where necessary, kept up to date; every reasonable step will be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- **Storage Limitation:** Personal data will be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- **Integrity and Confidentiality:** Personal data will be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- **Accountability:** ICOT College is responsible for, and be able to demonstrate compliance with the above principles.

5. Lawful Basis for Processing

ICOT College will only process personal data when there is a lawful basis for doing so, such as:

- **Consent:** The data subject has given explicit consent to the processing of their personal data for one or more specific purposes.
- **Contract:** Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- **Legal Obligation:** Processing is necessary for compliance with a legal obligation to which ICOT College is subject.
- **Vital Interests:** Processing is necessary to protect the vital interests of the data subject or of another natural person.
- **Public Interest:** Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in ICOT College.
- **Legitimate Interests:** Processing is necessary for the purposes of the legitimate interests pursued by ICOT College or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

6. Data Subject Rights

ICOT College respects the rights of data subjects under GDPR and the Irish Data Protection Act 2018, including:

- **Right to be informed:** Data subjects have the right to be informed about the collection and use of their personal data.
- **Right of access:** Data subjects have the right to access their personal data held by ICOT College.
- **Right to rectification:** Data subjects have the right to have inaccurate personal data rectified or completed.
- **Right to erasure ('right to be forgotten'):** Data subjects have the right to have their personal data erased in certain circumstances.
- **Right to restrict processing:** Data subjects have the right to restrict the processing of their personal data in certain circumstances.
- **Right to data portability:** Data subjects have the right to receive their personal data in a structured, commonly used, and machine-readable format and to transmit that data to another controller.
- **Right to object:** Data subjects have the right to object to the processing of their personal data in certain circumstances.
- **Rights in relation to automated decision making and profiling:** Data subjects have the right not to be subject to decisions based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

7. Data Collection

ICOT College will collect personal data only for specified and legitimate purposes. We will inform data subjects about the purposes of data collection, the categories of data collected, the recipients of the data, and their rights. Data will be collected directly from the data subject where possible. When data is collected from other sources, ICOT College will comply with the relevant transparency obligations.

8. Data Security

ICOT College will implement appropriate technical and organisational measures to ensure the security of personal data, protecting it against unauthorised access, unlawful processing, accidental loss, destruction, or damage. These measures include:

- Access controls (e.g., strong passwords, access levels).
- Encryption of personal data where appropriate.
- Regular security assessments and audits.
- Staff training on data protection and security.
- Secure storage and disposal of personal data.

- Procedures for handling data breaches.

9. Data Retention

ICOT College will retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. Retention periods will be determined based on the type of data, the purpose of processing, and any legal obligations.

10. Data Transfers

Where ICOT College transfers personal data outside the European Economic Area (EEA), it will ensure that appropriate safeguards are in place in accordance with GDPR, such as:

- Transferring data to countries deemed to provide an adequate level of protection by the European Commission.
- Implementing Standard Contractual Clauses approved by the European Commission.
- Ensuring the recipient is certified under an approved certification mechanism.

11. Data Breach Management

ICOT College has procedures in place to effectively manage data breaches. In the event of a data breach, ICOT College will:

- Assess the severity of the breach.
- Take immediate steps to contain and rectify the breach.
- Notify the Data Protection Commission (DPC) within 72 hours of becoming aware of the breach, where required.
- Notify affected data subjects where the breach is likely to result in a high risk to their rights and freedoms.
- Document the data breach and the actions taken.

12. Responsibilities

- **All Staff:** Are responsible for complying with this policy and ensuring the personal data they process is handled securely and in accordance with GDPR and Irish data protection law.
- **Heads of Departments:** Are responsible for ensuring that data processing within their departments complies with this policy and for providing training and guidance to their staff.
- **Data Protection Officer (or designated individual):** Is responsible for overseeing data protection compliance within ICOT College, providing advice and guidance on data protection matters, and acting as a point of contact for the DPC and data subjects.

13. Training

ICOT College will provide regular training to staff on data protection principles, this policy, and their responsibilities in relation to personal data.

In ICOT data is managed by the IT department. In Dublin, the IT Manager is Bruno Campos da Silva – [Bruno.campos@icot.ie](mailto: Bruno.campos@icot.ie) and in Cork the IT Manager is Wesley Lucas – wesleycork@icot.ie. All members have been successfully trained on –

Shiam Rahman – Data Protection Officer Training

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14. Monitoring and Review

This policy will be reviewed and updated regularly to ensure it remains compliant with relevant legislation and reflects best practices in data management.

15. Contact Information

For any questions or concerns regarding this Data Management Policy or the processing of personal data by ICOT College, please contact:

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Date of Last Review: 06/01/2025

Approval: