

## SEC Privacy Policy

### Who We Are

The Secondary Education Committee (SEC) administers the Department of Education's Protestant Block Grant Scheme. The SEC allocates means tested grants to necessitous members of Protestant communities to assist them in attending Protestant-managed schools. The eligibility criteria including eligible schools is specified in a memorandum of understanding with the Department of Education and the Rules and Regulations of the Protestant Block Grant Scheme.

Complete an assessment of applicant's means requires the gathering of personal data from applicants. Without this personal data, the SEC is unable to determine if an applicant is eligible and what level of support they require. The SEC is the data controller for all applications for support under the Protestant Block Grant scheme. This privacy policy will explain how our organization uses the personal data we collect from you for grant applications and when you use our website.

### What data do we collect?

We process information that you provide to assess your eligibility to apply for a grant for your children/s tuition or boarding fees in a secondary school recognised by the SEC. We also means test your application using data you provide us with.

The categories of personal data provided by you and collected by SEC for the purpose of assessment are:

- name, address and contact details, date of birth, PPS number
- marital and family status
- religious denomination
- details of your child/ren, names, date of birth, college/ school attendance
- employment details
- Income tax details, copy bank and financial statements, copy tax assessment forms.
- name, address and contact details, charity number of person verifying the religion of your child/ren
- details of incomes of parent/guardian

Information provided for grant applications is stored securely, in electronic form, and may be consulted by grant assessors if you make subsequent grant applications.

When you use our website, we collect certain data through cookies, which we use to improve the quality of the information we provide on our website.

### How do we collect your data?

You directly provide the SEC with most of the data we collect. We collect data and process data when you:

- Register online or apply online for a grant
- Voluntarily complete a survey or provide feedback on any of our message boards or via email.
- Use or view our website via your browser's cookies.
- Provide additional information that is requested by an SEC grants officer
- Make an appeal of an SEC grant officer's decision
- Through phonecalls

We may also receive your data indirectly from the following sources:

- Through conducting background checks on publicly available registers, databases and sources
- From information provided to us by schools that you are attending
- From information provided to us by your minister of religion or church

### **How will we use your data?**

The SEC collects your data so that we can:

- Process your grant application, and verify the information provided therein
- Comply with the rules and regulations of the Protestant Block Grant scheme
- Communicate the outcome of your grant application to your school
- Pay your school the value of your grant
- Verify your initial and continued eligibility for a grant

We will only share your data with external agencies in so far as it is necessary and secondary to the primary purposes of processing your application and paying your grant. In order to process your application we engage data processors. All data sharing arrangements are governed by respective data processing agreements which protect your privacy and restricts their access to it. Data may be transferred from their servers to ours in batch transfer or on a case by case basis. We use this information to complete your application.

We will also share the value of the allocated grant and the name of the pupil to your school in order to facilitate the payment of the grant.

### **How do we store your data?**

The SEC stores your data in electronic form on its secure servers. Records of all personal information are stored in centralised databases (including computerised and manual files) in the SEC data centre. All storage facilities are located in Ireland. SEC take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of

the data and against their accidental loss or destruction. Data Processing and Data Sharing agreements entered in to between SEC and the agencies / bodies with whom it exchanges data take account of the security measure requirements necessary to protect the data.

The SEC will keep the data provided on a secure Database for the purpose of on-going administration, audit and review. SEC will not keep personal data for any longer than is necessary and/or as required by law, whether under the Data Protection Legislation or otherwise. SEC may share the data submitted via the application process with authorised agents or third parties who act on behalf of SEC pursuant to a contractual relationship. SEC continues to be the Data Controller for this data and these authorised agents act as Data Processors on our behalf. Such agents or third parties are only permitted to use the personal data as instructed by SEC. They are also required to keep the data safe and secure.

Applicants and parties to applications may speak to employees of SEC (or agents acting on its behalf) by telephone. To ensure that SEC provides a quality service, the telephone conversations may be recorded. SEC will treat the recorded information as confidential and will only use it for staff training/quality control purposes, and for confirming details of the conversations with SEC.

If applicants and parties to applications requests that SEC communicate with him/her by email, the applicant is solely responsible for the security and integrity of their own email account. The transmission of information via the internet is not completely secure and consequently, while SEC will take all reasonable security measures, it cannot guarantee the privacy or confidentiality of information being passed via the Internet; any transmission is entirely at the applicants own risk.

We will keep your application data for 7 years. Once this time period has expired, we will delete your data from our database.

## **Marketing**

We would like to send you information about our grant process for the next year. If you have agreed to receive marketing, you may always opt out at a later date.

You have the right at any time to stop the SEC from contacting you for marketing purposes

## **Consent and Enquiry Handling**

You or other parties to your application can contact the SEC support line to make enquiries about the status of an application. In order to facilitate such enquiries, SEC will share information about the status of an application with all parties to that application. Contact centre staff will ask verification questions to ensure that we only share information with a party to the application.

We will not provide personal data of a party to an application to other parties to the application without their consent. We will limit the information that we share to the status of the application and clarification of any outstanding supporting documentation or actions that are required to

progress the application. In circumstances where disclosure of such information to another party to the application is not desired for personal reasons, the applicant should alert SUSI to this so that we can put appropriate controls in place on a case-by-case basis.

In circumstances where a third party (not a party to the application) requests information, personal data will not be shared without the consent of the subject of the information.

In circumstances where you or a party to the application provides personal data pertaining to another person who is not party to the application, consent must be provided by that person directly in order to allow SEC process their information.

Pursuant to Section 91 of the Data Protection Act 2018 and Article 15 of the GDPR, individuals may access their personal data and request a copy of their data held by SEC.

### **What are your data protection rights?**

The SEC would like to make sure you are fully aware of all of your data protection rights. Every applicant is entitled to the following:

**The right to access** – You have the right to request copies of your personal data.

**The right to rectification** – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request us to complete the information you believe is incomplete.

**The right to erasure** – You have the right to request that we erase your personal data, under certain conditions.

**The right to restrict processing** – You have the right to request that we restrict the processing of your personal data, under certain conditions.

**The right to object to processing** – You have the right to object to our processing of your personal data, under certain conditions.

**The right to data portability** – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us

Call us at: 01 551 4693

Or email us at [info@secgrant.ie](mailto:info@secgrant.ie)

Or by post: The Data Protection Officer, SEC, PO Box 12924, Dublin 14

## **Cookies**

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology

For further information, visit [allaboutcookies.org](http://allaboutcookies.org).

### **How do we use cookies?**

The SEC uses cookies in a range of ways to improve your experience on our website, including:

- Understanding how you use our website
- Improving the website in future

### **What types of cookies do we use?**

There are a number of different types of cookies, however, our website uses:

- **Functionality** – the SEC uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- **Advertising** – the SEC uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. The SEC sometimes shares some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

### **How to manage cookies**

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

### **Privacy policies of other websites**

The SEC website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

### **Other Data we Process**

## **Job application data**

All documentation received by SEC in relation to job applications will be processed in accordance with Data Protection legislation. The information will only be used by SEC for its legitimate interests, in the processing of job applications and for ongoing administrative purposes with job candidates. If you are offered a job by SEC this information will be added to your employee file, otherwise it will be retained for a year from close of the application process then securely destroyed.

## **School Data**

To facilitate effective engagement with schools we process and store data relating to officers at scheme member schools. This information is supplied to us from schools and is updated on their advice.

## **Changes to our privacy policy**

The keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 30 September 2021.

## **How to contact us**

If you have any questions about Our Company's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at: [info@secgrant.ie](mailto:info@secgrant.ie)

Call us: 01 551 4693

Or write to us at: Data Protection Officer, PO Box 12924, Dublin 14

## **How to contact the appropriate authority**

Should you wish to report a complaint or if you feel that Our Company has not addressed your concern in a satisfactory manner, you may contact the Data Protection Commissioner.

You can find their contact details here: <https://www.dataprotection.ie/en/contact/how-contact-us>