The Camden Education Trust CLG

Africa Code Week Privacy Notice

We are committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your participation in Africa Code Week (the "**Project**") in accordance with the General Data Protection Regulation ("**GDPR**") and other applicable data protection laws.

1. Who we are

The Camden Trust (the "Company", "CET" "we", or "us") is a controller of your personal data. We would like to provide you with details of the extent to which we process your personal information.

This privacy notice applies to all participants in the Project, including volunteers, teachers, participants, jury members. It is important that you read and retain this privacy notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using your personal data and what your rights are under data protection legislation.

2. How is your personal data collected?

We collect personal information about volunteers, teachers, participants, jury members through the administration and operation of the Project, either directly from those individuals or sometimes from a co-founder of the Project. We may sometimes collect additional information from third parties including participating educational institutions, our teaching resources and regional coordinators. We may from time to time collect additional personal information during induction and in the course of Project-related activities throughout the Project period.

3. The purpose and legal basis for processing your personal data

Personal data, or personal information, means any information about an individual from which that person can be identified. We have detailed in the table below, your personal data which we may from time to time collect, the purpose or purposes for which we process this personal data, as well as the legal basis for such processing:

Personal Data	Purpose for Processing	Legal Basis for Processing
Basic information about you such as name, age, place of birth, location, position, gender, email, telephone number.	For Project administration purposes, including Project management and planning, registration with Project-specific programs, allocation of resources and accounting purposes. To use in participant biographical information blurbs on any Project-specific website, documentation, newsletters,	In order to pursue our legitimate interests of conducting Project personnel and participant administration and Project-specific program registration. To pursue our legitimate interests in efficiently managing and developing the Project and to market the Project.

Personal Data	Purpose for Processing	Legal Basis for Processing
	training and communications materials.	
Language preference, teaching institution name and location and taught subjects.	(i) For Project-specific program administration purposes, including registration and allocation of resources.	(i) In order to pursue our legitimate interests of conducting Project-specific program-registration and conducting participant administration.
	(ii) To use in participant biographical information blurbs on any Project-specific website, documentation, newsletters, training and communications materials.	(ii) To use in participant biographical information blurbs on any Project-specific website, documentation, newsletters, training and communications materials.
Basic financial details, including bank account details and tax status and other relevant information.	For wage, expenses and other payment purposes.	In order to ensure the performance of a contract to which you are a party.
Your CV, previous work history information, details of prior experience, your qualifications and skills.	For assessing qualifications for a particular job or task relating to the Project and the appropriate allocation of teaching resources.	In order to pursue our legitimate interests of allocating the most appropriate personnel and effectively managing the Project administration.
Information about your marital status, next of kin, dependants and emergency contacts.	For personnel administration and safety purposes, including contacting relatives in incidents of illness or accident.	In order to comply with our legal obligations and to pursue our legitimate interests to ensure the health and safety of Project participants.
Health data such as information about your	To ascertain your fitness to participate with the Project and	In order to comply with our legal obligations. Insofar as we process

Personal Data	Purpose for Processing	Legal Basis for Processing
physical or mental health or disability status.	providing workplace adjustments.	special categories of personal data, the legal basis for such processing is your explicit consent.
Information relating to complaints, grievances, performance or disciplinary issues including information created in the course of a disciplinary process.	For use in respect of any possible grievance or disciplinary hearings, including making decisions about your continued employment or engagement or making arrangements for the termination of our working relationship.	In order to ensure the performance of a contract to which you are a party and to pursue our legitimate interests of effectively managing our business operations and resolving, issues or grievances and exercising and defending our legal rights.
Information relating to any legal issues or disputes that may arise involving you.	For dealing with legal claims or disputes involving you, or other employees, agents and contractors, including accidents at works.	In order to comply with our legal obligations and to pursue our legitimate interests of effectively managing our business operations and exercising and defending our legal rights.
Where appropriate, photographs, likeness, images and videos of you and use of voice and voice recordings.	To use in any Project-specific website, documentation, newsletters, training and communications materials.	To pursue our legitimate interests in efficiently managing and developing the Project and to market the Project.

4. Third party information

Where you provide us with personal data relating to other people, such as your spouse or other related persons, you will only do so in accordance with local data protection laws. You will ensure that before doing so, the individuals in question are made aware of the fact that we will hold information relating to them and that we may use it for any of the purposes set out in this Project Privacy Notice. Where necessary, you will also obtain their consent to our use of their information. We may, where required under applicable law, notify those individuals that you have provided their details to us.

5. Keeping your information up-to-date

We encourage you to make sure that the personal data we hold about you is as accurate and up to date as possible. To make any changes, drop us a line using the contact details below.

6. Automated decision-making

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

7. Recipients of your personal data

We will, from time to time, send some of your personal data to certain recipients as detailed below.

- (a) **Transfers to service providers**: CET contracts with third party service providers, such as companies working with IT, cloud services and insurance. This is done in our legitimate interest in effectively operating the Project. When such third-party data processors process personal data on our behalf, we enter into agreements with them to ensure that they process your personal data in accordance with applicable law.
- (b) **Transfers to Project partners:** CET may transfer your personal data to other organisations partnering with CET on the Project, such as SAP, Irish Aid and UNESCO YouthMobile. This is done in our legitimate interest in effectively conducting, funding, streamlining and further improving the Project. A full list of Project partners is available here.
- (c) **Transfers to third parties**: CET may transfer your personal data to other third parties, such as governmental agencies and regulators (e.g. tax authorities), courts, government authorities and to external advisors acting as controllers (e.g. lawyers, accountants, auditors etc.). Such transfers are made in order to comply with our legal obligations and for the legitimate interests pursued by CET or a third party to ensure the effective operation of the Project.

You can ask for further information in relation to the recipients of your personal data through the 'Contact us' details below.

8. International transfers

We may, from time to time, send some of your personal data to recipients based in countries located outside of the European Economic Area ("**EEA**"). As certain countries are not within the EEA, this may mean that such countries are not deemed to provide an adequate level of protection for your personal information. To ensure that your personal data receives an adequate level of protection we will put in place for any international transfers appropriate measures, as provided for under data protection laws, in order to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects EU data protection laws.

9. How long we retain your personal data

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for your personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

10. Your rights

You have certain rights under data protection legislation as set out below:

- (a) Right of access.
- (b) Right to rectification.
- (c) Where processing is based on your consent, the right to withdraw that consent at any time.

In certain circumstances:

(d) Right to erasure (right to be forgotten).

- (e) Right to restriction of processing.
- (f) Right to data portability.
- (g) Right to object.

Your rights will in each case be subject to the restrictions set out in applicable data protection laws. Further information on these rights, and the circumstances in which they may arise in connection with our processing of your personal data, can be obtained by contacting us using the details in the 'Contact us' section below. If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact us using the details in the 'Contact us' section below.

If you have any issue or grievance in respect of our handling or processing of your personal data in any way, you have the right to lodge a complaint to the Data Protection Commission, whose contact details are as follows:

Telephone: 1890 252 231

E-mail: info@dataprotection.ie

Address: 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland.

11. Additions and changes

We may make updates and amendments to this privacy notice. If we do, we will inform you in advance of any intended material changes taking effect and will also explain the likely impact of those changes. If changes to this privacy notice are communicated to you, please read the updated privacy notice carefully.

12. Contact us

In order to make a query, raise a concern, avail of your data protection rights or for any other reason related to this privacy notice, please contact us using the below contact details:

Telephone: +353 87 2420114

E-mail: <u>bernard.kirk@thecamdentrust.org</u>

Address: Galway Mayo Institute of Technology, Centre for Creative Arts and Media,

Monivea Road, Galway. H91 DY9Y