

1. Introduction to GDPR

The General Data Protection Regulation (GDPR) is a regulation by which the European Parliament, the European Council and the European Commission intend to strengthen and unify data protection for individuals within the European Union (EU). It applies to organisations:

- That are based in the EU
- Doing business or providing services to people in the EU (whether for money or not)
- Engaging in systematic profiling of people in the EU

The GDPR has extra-territorial effect, so even companies and organisations not in the EU that do business with people or firms in the EU are affected. It comes in to force on the 25th May 2018.

The Regulation ensures that the fundamental right of every EU citizen to data privacy is respected and protected.

2. The TUI

The Teachers' Union of Ireland is a Trade Union organising teachers and lecturers in Ireland engaged in post-primary, higher, further and adult education. TUI represents over 17,000 members in the post-primary, higher, further and adult sectors of the education service.

3. Trade Unions and Data Privacy

The data of our members and everyone that we deal with is important to us. Under GDPR, data which relates to membership of a Trade Union is classified as being a 'special category of personal data' and 'sensitive personal data'. Therefore, the data of our members is subject to a high level of protection.

Our Data Protection Policy is reviewed on a regular basis and updated when required. This privacy statement is an overview of the policy and outlines the key areas.

4. On what basis does the TUI collect data?

Under the GDPR, the reasons for which an organisation may collect and use personal data are referred to as the 'lawfulness' or 'legal basis' for processing.

The reasons, constituting the main legal basis relied on by the TUI as set out in Article 6 of the Regulation, are:

- Performance of a contract/provision of service to members
- Compliance with legal obligations
- The legitimate interests of the organisation
- Consent (see point 7 below)

5. What data does the TUI collect, how is it collected and how is it used?

As part of our daily service we collect the following data:

Source	Type of data	Basis/Use
Membership Application Form	<ul style="list-style-type: none">• Name• Address• Workplace Address• Employment Details• Date of Birth• email and phone number	<ul style="list-style-type: none">• Legitimate interests of the TUI• Provision of service/Performance of contract• Legal Obligations

	<ul style="list-style-type: none"> • Details of membership of any other trade union 	<ul style="list-style-type: none"> • Email and text communication (based on consent)
Deduction at Source form	<ul style="list-style-type: none"> • Name • Workplace Address • Employment Details • Payroll number 	<ul style="list-style-type: none"> • Legitimate interests of the TUI • Provision of service/Performance of contract
Expense claim forms	<ul style="list-style-type: none"> • Name • Address • Bank details 	<ul style="list-style-type: none"> • Processing of payments • Legitimate interests of the TUI • Legal obligation (compliance with Revenue rules)
TUI Members App	<ul style="list-style-type: none"> • Name • Date of birth • Email and phone number • Employment details 	<ul style="list-style-type: none"> • Legitimate interests of the TUI • Provision of service/Performance of contract • Consent (push notifications)
Website	<ul style="list-style-type: none"> • Cookies • Contact details on the 'Contact us' page • Online membership form (as membership application form above) 	<ul style="list-style-type: none"> • Legitimate interests of the TUI • Provision of service/Performance of contract
Communication with individual members, volunteers or specific groups of members	<ul style="list-style-type: none"> • Phone number • Email address 	<ul style="list-style-type: none"> • Legitimate interests of the TUI • Provision of service/Performance of contract • Provision of training • Notification of meetings/events/training
Case work	<ul style="list-style-type: none"> • Phone number • Email address • Employment details • Employment history • Specific data relating to the case 	<ul style="list-style-type: none"> • Legitimate interest of the TUI • Provision of service/Performance of contract • Legal obligation
Research	<ul style="list-style-type: none"> • Usually this information is anonymised but the TUI may require name, phone number, email address. Occasionally workplace details and history may be recorded 	<ul style="list-style-type: none"> • Legitimate interests of the TUI • Provision of service/Performance of contract • Provision of training

6. What are the TUI's obligations under the GDPR?

We are obliged to ensure:

- That we process your data in a lawful, fair and transparent manner
- That we only process data in line with the stated purposes
- That we only keep the minimum amount of data which is required to undertake this purpose
- That data is accurate and up-to-date
- That data is retained in line with our data retention policy
- That data is kept in a secure manner
- That we comply with the GDPR and consider data security as an integral part of our organisation

The TUI is committed to meeting these obligations.

7. Consent

The TUI relies on consent to process the data of our members in relation to bulk text, email and push notification communications.

Consent can be withdrawn at any stage:

- **For bulk email communication** – by emailing the TUI's Data Protection Officer DPO@tui.ie
- **For bulk text communication** – by emailing the TUI's Data Protection Officer as above or emailing STOP@tui.ie
- **For push notifications on the TUI Members App** – Users of the App are asked whether they wish to receive notifications when registering to use the App. Notifications can be switched off at any time via the settings on the user's phone.

The TUI may, only once consent has been given and on a once-off basis, pass on contact details to Cornmarket who offer insurance products and financial advice specifically designed for TUI members. Once consent has been given, it can be withdrawn from Cornmarket at any time by:

- Writing: to Cornmarket Group Financial Services Ltd, Christchurch Square, Dublin 8
- Emailing: dataprotection@cornmarket.ie
- Telephoning: 01 4084000

8. Profiling/Automated Decisions

The TUI website uses cookies for statistical purposes to enhance the website and improve the service offered to members. As far as possible, data is anonymised.

The TUI does not use this information for any other purpose and this information is not used to make automated decisions about members or those using the website.

9. Who can access data?

The TUI does not sell information to marketing companies or any third party. Information may be shared with Cornmarket as outlined above only if consent has been given. Employees of the TUI, volunteers and service providers contracted to the TUI (including the Union's legal advisors), all of whom are involved in the legitimate interests of the Union, can access some or all of this data as

appropriate to the person/organisation's function. Where service providers have access to personal data, the necessary contracts and service level agreements are in place to ensure compliance with the GDPR.

The TUI sends Deduction at Source forms to the payroll departments of employers of TUI members. This is necessary in order to deduct union subscription from members' salaries, without which the TUI would be unable to operate or provide a service.

10. Is data transferred outside of the EU?

No. No data held by the TUI or its service providers is held outside of the EU. This includes cloud storage.

11. How long does the TUI keep data?

The TUI will keep data for as long as is necessary as part of the legitimate business of the TUI.

12. Is data secure?

All electronic data is encrypted and is kept on secure servers.

The TUI is undertaking on-going measures to ensure that all data held by the Union is secure.

13. What are my rights under GDPR?

Under GDPR, you have the right to:

- obtain details about how data is processed by an organisation or business
- obtain copies of personal data that an organisation holds on you
- have incorrect or incomplete data corrected
- have data erased by an organisation, where, for example, the organisation has no legitimate reason for retaining the data
- obtain data from an organisation and to have that data transmitted to another organisation (Data Portability)
- object to the processing of data by an organisation in certain circumstances
- not be subject to (with some exceptions) automated decision making, including profiling.

Further details on your rights are available from the Office of the Data Protection Commissioner website <http://gdprandyou.ie>

14. Who should I contact about my personal data held by the TUI?

In the first instance, contact the TUI's Data Protection Officer by email at DPO@tui.ie

If this does not resolve your query or concern to your satisfaction, you should contact the Office of the Data Protection Commissioner. Contact details are available at <http://gdprandyou.ie/contact-us/>

Both this statement and the TUI's Data Protection Policy are reviewed on a regular basis.

Please check this statement regularly and read it carefully for updates.