

# THE JAMES JOYCE CENTRE



35 North Great George's St · Dublin 1

Tel. +353 (1) 8788547 . Email [info@jamesjoyce.ie](mailto:info@jamesjoyce.ie) . Web [www.jamesjoyce.ie](http://www.jamesjoyce.ie)

## **General Data Protection Regulations (GDPR) Policy adopted by Board September 2018**

The James Joyce Cultural Centre (JJCC) subscribes to the General Data Protection Regulation (GDPR) which came into effect on 25<sup>th</sup> May 2018. It maintains compliance with GDPR provisions as articulated in this Policy which aims to protect personal data of individuals which has been provided to the company for its business purposes.

### **Purpose**

The Company will obtain personal data only where relevant, and necessary, for its business purposes and will retain it for a time delimited period which is appropriate to purpose. It will, if a continuing need is determined for reasons of the archival record, obtain consent of individuals to data retention beyond the initial period and purpose for which personal data was initially required.

### **Scope of Policy**

**The policy will extend to all those** directly associated with the direction, management and operation of the Centre and will include,

- Directors of the Board of the James Joyce Cultural Centre, current & previous,
- Members of the James Joyce Cultural centre, current & previous,
- Employees, current and previous,
- Persons engaged under the auspices of external agencies in training, or in education and research programmes held at the Centre, or arranged by the Centre.

**The policy will also extend to persons whose services are secured on basis of:**

- Casual or temporary employment, those recruited on one-off or short-term basis to assist in delivery of programming activity, e.g., Lecturers, Artists, Caterers, Maintenance and Installation facility providers, and Exhibitors;
- External independent professional resource service providers, including Auditors, Accountants, Human resource consultants, or other applicable service providers; and
- Representatives of online marketing lists, on-line shop services to which the Centre subscribes; and,
- Visitors to the Centre who provide personal data when completing business related surveys;

- Any others, as applicable, whose personal data has been provided to the Centre and who may not be noted above.

### **Scope of Personal Data**

Personal data will cover information provided by individuals to the company in order that it is enabled to comply with legal requirements, such as company legislation, charities legislation, employment, and health and safety legislation, and in order that it can undertake its business functions efficiently and effectively,

Personal data received may include records in written form, in electronic form and in image form which is obtained for reason of security, via Centre -based CCTV cameras.

### **Consent**

It will be a requirement that all staff employed by the company or whose services are secured by the company in any category whatsoever, or who provide personal details to the company for purpose of declaring interest in employment, agree to give consent to the company obtaining, and holding, relevant personal data, in order that company business may be conducted in an efficient and effective manner.

Acceptance from individuals of employment offers by the company, or acceptance by resource providers to supply product, whatever form that may take, and who provide personal data to the company for its business purposes, will by their actions be determined to have given consent to the holding by the company of their personal data for James Joyce Cultural Centre business purposes.

### **Confidentiality**

The policy of the company is to apply strict confidentiality to the process of securing all personal data obtained, and held by the Centre. To that end, it will ensure that appropriate protocols are applied to the process of protecting personal data which it holds. It will ensure in so far as it is possible to do so, that all employees and others subject to this policy, and in accordance with their contracts and codes of conduct, will maintain the highest levels of confidentiality in respect of data which comes to their attention while they are engaged in carrying out James Joyce Centre business.

### **Policy implementation**

Since 2018, JJCC has formal implementation processes in place, based on operational protocols devised by the manager. The processes will be subject to regular review aimed at ensuring continuing compliance with GDPR regulations, and compliance with Company policy.

The Policy of the Centre is to continue to:

- Examine how and in what form personal data is held and maintain appropriate and secure filing systems;
- Determine and approve as appropriate, employee access to personal data held by the Centre;
- Operate secure access protocols, including password-controlled access to electronic data;
- Enforce a strict policy whereby employees will not share passwords of other employees which allow the password holder only access to sensitive data of any kind. This policy extends to employees who may,

from time to time, be required to act in a delegated or temporary capacity within the Centre staffing structure, and to undertake duties where they may have access to personal sensitive data;

- On a case-by-case basis, and only, when necessary, express agreement may be given by the board or the Company Secretary, acting on its behalf, for a person acting in a delegated or temporary capacity to use their personal work password to gain access to personal data of others;
- Assess, and apply an appropriate data retention/ disposal policy in line with evolving information systems;
- Implement appropriate measures to ensure security of data held electronically, or in print form;
- Implement a system of securing consent to holding of personal data, such as may be required for the historic archival record, subject to the requirements of this policy, and,
- Maintain a Privacy Statement on its website.

Reviewed and approved by Board

Signed

Date. 29 February 2024