



**Data Protection Privacy Statement for
HAP Shared Services Centre**

Who we are and why do we require your information?

Limerick City and County Council seeks to promote the economic, social and cultural development of Limerick City and County and in doing so contribute significantly to improving the quality of life of its people. The delivery of high quality services, tailored to meet the needs of all our customers, remains one of Limerick City and County Council's core objectives and is included in our Corporate Plan. This quality service includes not only the level and quality of service given to our customers, but also the quality of our decision-making processes, the efficiency and effectiveness of our corporate operations, standard of our facilities and our ability to adapt in an ever-changing environment. In order to provide the most effective and targeted range of services to meet the needs of the citizens, communities and businesses of Limerick City and County we will be required to collect, process and use certain types of information about people and organisations. Depending on the service being sought or provided, the information sought may include 'personal data' as defined by the Data Protection Acts and by the General Data Protection Regulation (GDPR) and may relate to current, past and future service users; past, current and prospective employees; suppliers; and members of the public who may engage in communications with our staff. In addition, staff may be required, from time to time, to collect, process and use certain types of personal data to comply with regulatory or legislative requirements.

Why do we have a privacy statement?

Limerick City and County Council has created this privacy statement in order to demonstrate our firm commitment to privacy and to assure you that in all your dealings with Limerick City and County Council that we will ensure the security of the data you provide to us. Limerick City and County Council creates, collects and processes a significant amount of personal data in various multiple formats on a daily basis. Limerick City and County Council's commitment is that the personal data you may be required to supply to us is;

- Obtained lawfully, fairly and in a transparent manner
- Obtained for only specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary for purpose for which it was obtained
- Recorded, stored accurately and securely and where necessary kept up to date
- Kept only for as long as is necessary for the purposes for which it was obtained.
- Kept in a form which permits identification of the data subject
- Processed only in a manner that ensures the appropriate security of the personal data including protection against unauthorised or unlawful processing.

Data Protection Policy

Limerick City and County Council has a detailed Data Protection Policy which outlines how we as a public body are committed to ensuring the security of any personal data you provide to us.

What is the activity referred to in this Privacy Statement?

HAP Shared Services Centre

Limerick City and County Council Housing Assistance Payment Shared Service Centre (HAPSSC), as data processor, provides specific financial transactional and reporting services on behalf of all Local Authorities (data controller) and the Department of Housing, Planning and Local Government (DHPLG) in the delivery of the HAP scheme, a key form of government social housing support.

The HAP Shared Services Centre as data processor needs to process certain personal data in order to carry out tasks required in the course of the performance of our functions and to comply with certain legal obligations

What is the basis for making the processing of personal data in this activity lawful?

Article 6(e) GDPR processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

Part 4 Housing (Miscellaneous Provisions) Act 2014

Section 149(A) Local Government Acts 2001-2014

Housing Authorities Functions under the Housing Acts 1966 to 2014

Data Processing Agreements with Data Controllers

We require your contact details

In order to communicate with you, you will be asked for contact details. Please note that to help protect your privacy, we take steps to verify your identity before granting access to personal data. These contact details may also be used to verify your identity.

What other items of personal data do we need to undertake this activity?

The HAP Shared Services Centre will process data as collected by the Local Authority from data subjects (via HAP Tenant and HAP Landlord application forms) in order to administer the Housing Assistance Payment Scheme, in addition to any personal data provided in supporting documentation by HAP applicants and landlords

Is the personal data submitted as part of this activity shared with other organisations?

Limerick City and County Council may, to fulfil statutory or regulatory obligations or in the public interest, from time to time, have to share personal data with other organisations or entities (in Ireland or abroad). Where this is required, Limerick City and County Council shall have regard to the security and integrity of the data and will minimise the data shared.

In this process, the data will be shared with the following recipients:

Other public bodies where processing is necessary for compliance with a legal obligation to which the controller is subject i.e. Residential Tenancies Board, Revenue Commissioners, Department of Employment Affairs and Social Protection, Department of Housing, Planning and Local Government, Local Authorities in respect of private rental inspections for inter authority movement of HAP Households and the Central Statistics Office.

Other secondary processors to carry out processing on behalf of the data controller e.g. ICT support contractors i.e. Credit Card Systems Ireland, Realex Payments, Sybernet Ltd., Office of the Government Chief Information Officer (OGCIO), Revenue Commissioners, Unit 4, Ascendas Business Solutions, GeoDirectory, Data Ireland and Limerick City and County Council ICT Department

In this activity, if the personal data is to be transferred to a different country, it will be transferred to the following countries (if there are no countries listed, it is not intended to transfer the personal data abroad)

How long is this personal data held by Limerick City and County Council?

The HAP Shared Services Centre will only retain your personal data as determined by the data controllers for as long as it is necessary for the purposes for which they were collected and subsequently processed, and in line with certain statutory requirements, where relevant.

The data controller will advise when the personal data is no longer required and instruct the HAPSSC to destroy or delete it in a secure manner

The data processed as part of this activity will be retained for the following period(s):

Records are to be maintained in line with the Data Controllers records management policy

What will happen if the requested personal data is not provided?

Without relevant personal data being provided individuals will not be eligible to participate in the HAP Scheme

Your Rights

To the extent that the HAP Shared Services Centre as Data Processor processes your personal data for or on behalf of the Data Controller, the Data Processor undertakes to notify the Data Controller if it receives any complaint, notice or communication which relates directly or indirectly to the processing of your personal data or to compliance with Applicable Data Protection Law and provide the Data Controller with full co-operation and assistance in relation to any such complaint, notice or communication

The HAP Shared Services Centre as Data Processor can provide you with the relevant contact details for your relevant Local Authority (Data Controller)

You have the right to request access to personal data held about you, obtain confirmation as to whether data concerning you exists, be informed of the content and source of data and check its accuracy. In addition, if the data held by us is found to be inaccurate you have the right to change, remove, block, or object to the use of, personal data held by Limerick City and County Council. You also have the right to data portability. In certain circumstances blocking access to data may delay or remove access to a service where the data is required by law or for essential purposes related to delivery of a service to you. To exercise these rights, you should contact Limerick City and County Council at the following address:

email: dataprotectionofficer@limerick.ie

Data Protection Officer,

Limerick City and County Council,

Merchants Quay,

Limerick

Right of Complainant to the Office of the Data Protection Commissioner

If you are not satisfied with the outcome of the response you received from Limerick City and County Council in relation to your request, then you are entitled to make a complaint to the Data Protection Commissioner who may investigate the matter for you.

The Data Protection Commissioner's website is www.dataprotection.ie or you can contact their office at:

Lo Call Number: 1890 252 231

E-mail: info@dataprotection.ie

Postal Address:

Data Protection Commissioner

Canal House

Station Road

Portarlinton,

Co. Laois. R32 AP23.