

### **Core Principles of the General Data Protection Regulation**

The General Data Protection Regulation (GDPR) comes into force across the European Union Members States on Friday 25<sup>th</sup> May 2018.

Under GDPR, Veterinary Ireland is required to comply with the core principles of data protection which require it to:

- collect no more data than is necessary from an individual for the purpose for which it will be used;
- obtain personal data fairly from the individual by giving them notice of the collection and its specific purpose;
- retain the data for no longer than is necessary for that specified purpose;
- to keep data safe and secure; and
- provide an individual with a copy of his or her personal data if they request it.

### **What Data is Collected**

In the course of its role and objectives to represent Veterinary Practitioners in Ireland and to facilitate the veterinary profession in its commitment to improving health and welfare of the animals under its care, to protecting public health and to serving the changing needs of its clients and the community through effective and innovative leadership, Veterinary Ireland will collect, collate and process personal data on members, employees and other veterinary professionals. Depending on the level of a data subject's interaction and relationship with Veterinary Ireland, this personal data may include: name, address, telephone/mobile number, email address, Veterinary Council of Ireland Registration Number, academic post-nominals, Department of Agriculture TB/TVI numbers, annual membership fees paid, if availing of special membership fee rates ("Y" for retired, maternity, etc), Interest Group / Branch / Specific Purpose Committee membership and attendance at Veterinary Ireland meetings, including Continuing Veterinary Education (CVE) events. With regards to Veterinary Ireland Events, photographs may be taken and used in Veterinary Ireland publications, including the Veterinary Ireland Journal and the Veterinary Ireland Annual Report.

In circumstances where relevant and where supplied by the data subject in the context of membership payment, bank account and credit card details may be retained in order to facilitate ongoing payment of membership fees by direct debit. Where Veterinary Ireland members contact Veterinary Ireland Headquarters in relation to queries on veterinary matters, including business, employment law, etc., then personal data may be stored in confidence, in relation to ongoing cases.

In addition to the general data described above, other relevant data, including Social Welfare and Revenue Identification, car make and registration, will be retained for those employees and Veterinary Ireland members who are in receipt of remuneration and / or expenses in relation with Veterinary Ireland work.

In general, the personal data stored will be obtained from Membership Application Forms. Where TVI and TB work is done and permission for the relevant levy to be deducted is given, then data from the Form will be forwarded to the Department of Agriculture, Food and the Marine. Otherwise, personal data will be obtained and amended when supplied by data subjects. The Veterinary Ireland Website will not collect personal data, other than cookies, which users are asked to consent to when using the website.

In order to advise non-members of relevant veterinary information, including clinical advice from third parties (e.g. disease outbreak notices from the Department of Agriculture, Food and the Marine, Veterinary Ireland membership benefits, and Veterinary Ireland CVE Courses in order to meet their statutory obligations under the mandatory CVE Scheme, Veterinary Ireland may from time-to-time utilise open-source material, including that available from the Veterinary Council of Ireland.



### **The Legitimate Processing of Personal Data by Veterinary Ireland**

While under the General Data Protection Regulation (GDPR) personal data can be processed with the explicit consent of a data subject (Article 6.1(a)), Veterinary Ireland is not obliged to now obtain the explicit consent of each and every data subject in order to process personal data after the GDPR becomes operational on 25th May 2018. As a licensed Trade Union (568T), Veterinary Ireland may lawfully collect and process personal data, with appropriate safeguards, under a number of other GDPR Articles.

In the main Veterinary Ireland will process personal data, with appropriate safeguards, in order to fulfil its contractual obligations with its members and staff (Article 6.1(b) of the GDPR refers).

As well as these contractual obligations, Veterinary Ireland processes the personal data of members, former members and persons who have regular contact with it in connection with its purposes in the course of its legitimate activities (Article 6.1(f)), especially in the context of its operations as a representative body (Article 9.2(d)).

Personal Data may also be legitimately processed by Veterinary Ireland subject to legal obligations on the organisation (Article 6.1(c)). Such obligations include the payment of wages, the collection of taxes and PRSI, and the carrying out of obligations and exercising the specific rights of Veterinary Ireland and/or its members in the field of employment, including collective agreements and the undertaking of ballots under the Industrial Relations Acts (Article 9.2(b)).

Personal data of members and non-members may also be processed where Veterinary Ireland, in the pursuit of its objectives, including representation of members, is involved in the various activities associated with preparing and taking legal cases (Article 9.2(f)). In addition, processing of personal data may be necessary to protect the vital interests of data subjects or another natural person through Veterinary Ireland's activities in representing the veterinary profession in Ireland, and internationally (Article 6.1(d)).

Under the Continuing Veterinary Education (CVE) requirements of the Veterinary Practice Act 2005 (Amended 2012), Veterinary Ireland provides pertinent CVE to its members and to other members of the Irish veterinary profession, including Registered Veterinary Practitioners (RVPs) and Registered Veterinary Nurses (RVNs). In providing this CVE, Veterinary Ireland will process personal data in the pursuit of protecting the vital interests of data subjects, namely the provision of CVE which is a requirement for re-Registration (Article 6(d)), as well as in the performance of a contract for the provision of CVE, to which data subjects are parties (Article 6.1(b)).

### **Security of Personal Data**

Veterinary Ireland protects the personal data that it holds in line with GDPR rules and is subject to the new GDPR provisions including transparency and erasure.

Veterinary Ireland, through ongoing advice and review by our IT partners, takes all relevant measures to ensure the security and integrity of the personal data held in its systems, both in hard copy and electronically. All data controlled by Veterinary Ireland is only stored within the European Union.

Veterinary Ireland will not share personal details with any third parties, outside of regulatory or legal requirements, or in acting on a data subject's behalf in relation to membership benefits as a member of Veterinary Ireland, or on the basis of a contract (e.g. for the purposes of CVE Credits to the Veterinary Council of Ireland for attendance at a Veterinary Ireland CVE Event).

### **Retention of Personal Data**

Personal data is only stored by Veterinary Ireland so long as there is a need to do so, including under legal and statutory requirements. The general policy is that when the original purpose for which the personal data was obtained has expired, then Veterinary Ireland will ensure the secure destruction of the personal data, including by cross-cut shredding of hard copy material.



## The Rights of Data Subjects

Those data subjects for whom Veterinary Ireland holds personal data have a number of rights under the GDPR:

1. *Right to be informed* - to know what personal data is collected, why it is collected, and who has access to it in relation to third parties;
2. *Right to access personal data* - have access to personal data, via a Data Access Request, and copies be provided to them within one month of making the request - Data requests are free of charge and should be made in writing to the Chief Executive, Veterinary Ireland, 13 The Courtyard, Kilcarbery Park, Nangor Road, Dublin 22 D22 XH05;
3. *Right to rectification* - the right to have any personal data updated and amended, especially if any error could have an impact on them (e.g. work / medical / financial);
4. *Right to erasure* (aka "the right to be forgotten") – request that all personal data relating to them be erased, including paper and electronic (including any back-ups). Only where a regulatory or legal requirement overrides this right, can Veterinary Ireland refuse this request. (NB: It should be noted that for any current member requesting the right to erasure, then Veterinary Ireland may not be able to supply membership benefits and information, as would be expected under the contract of membership);
5. *Right to restrict processing* - limit how personal data is processed. Again, only where a regulatory or legal requirement overrides this right, can this right be refused;
6. *Right to data portability* - request that personal data be transferred to another data controller. This might be on the change of a service supplier, etc.;
7. *Right to object* - object to processing of personal data for direct marketing (or profiling); or for processing based on legitimate interests or the performance of a task in the public interest or exercise of official authority; or for processing for the purposes of scientific / historical research & statistics;
8. *Rights to automated decision making and profiling* - Data Controllers need to state if they utilise automated profiling, and if so, the individual can request that they be made aware of any automated decisions made and how this might affect them. Veterinary Ireland does not utilise automated decision making and profiling.

Should a data subject have any queries in relation to personal data held by Veterinary Ireland, or if they no longer wish to receive some or all of these types of communications from Veterinary Ireland, then please contact Veterinary Ireland Headquarters on 01-457-7976 or by email at [HQ@vetireland.ie](mailto:HQ@vetireland.ie).

Thank you for your continued interaction with Veterinary Ireland, and we look forward to representing our members and the Irish veterinary profession on into the future.

Yours sincerely

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**Finbarr Murphy**  
Chief Executive