

St. Michael's College Website Privacy Statement



St. Michael's College is committed to protecting the privacy of all visitors to our school website www.stmc.ie. This statement explains how we go about this.

While we collect very little, if any, personal data from website visitors, in cases where we do so (for example where you voluntarily provide information using the "Contact Us" form) this statement explains the purposes and lawful bases that underlie this processing. It also addresses our other obligations and your rights under relevant legislation including:

- the Irish Data Protection Act 2018
- the European General Data Protection Regulation (GDPR) 2016
- the Irish e-Privacy (Privacy and Electronic Communications) Regulations 2011.

This "Privacy Statement" represents just one part of a comprehensive Data Protection Policy that has been put in place by the school's Board of Management (who act as the data controller for **St. Michael's College**). A copy of this full Data Protection Policy is available on request. If you have any questions, or require any further clarifications, please forward your query to the school marked for the attention of the school principal.

Information we collect and how do we use it

We collect and further process two types of information from visitors to our website.

1. Non-Personal Information

When you visit our website, certain non-personal data is collected by our website provider. This data is defined as "non-personal" because it has been anonymised i.e. it cannot be used to identify you.

This anonymised data is processed on a non-individual basis and provides us with aggregate statistics about our website visitors including, for example, browser used (Chrome, Safari, etc.), device used (phone, tablet, computer), geographical location (city, country, etc), date and time of visits to our website and the number of pages visited.

We use this non-personal data to get an understanding of where our visitors come from and to help us better design and organise our website.

2. Personal Data

Some visitors to our website may voluntarily provide personal data to us (personal data is information that can be used to identify a living individual). For example, you might choose to email

us or to complete our “Contact Us” form and in doing so you will provide some personal data, for example:

- your email address
- your name
- your address
- your telephone number

Any information that you provide to us in this way will only be used by St. Michael’s College in line with the purposes for which it has been provided it (e.g., to contact you and answer any queries that you have raised in the “Contact Us” form or to address any other feedback that you have sent us using the “Contact Us” form) or for any reasonably incidental purpose concerning St. Michael’s College.

In these circumstances the legal basis for processing your personal data will be either (i) our legitimate interest in responding to your request or (ii) that you have demonstrated your consent. We will not process your personal data for any purpose unless we are confident that we have a lawful basis for doing so (in line with Article 6 of the General Data Protection Regulation).

Sharing of your Personal Data

Any personal data that you send to us via our website will only be shared on a limited basis within St. Michael’s College and where that sharing is necessary for your query to be addressed. For example, if you are seeking information about enrolment in the College your personal details may be shared with the member of College staff responsible for this area so that they are able to appropriately respond to your request.

We do not disclose or distribute your personal information to any third parties. Unless there is an appropriate lawful basis (e.g. a requirement to do so under Irish or European law), we will not otherwise share any of the information you provide to us without your consent.

Your personal data may be anonymised and used for statistical purposes. Where information on the usage of our website is shared with third parties, this will not include any information that can be used to identify you.

Tracking and Cookies

St. Michael’s College makes no attempt to find out the identity of anyone visiting our website. So when someone visits www.stmc.ie, and internet log information is collected, we ensure this is done in a manner that does not identify anyone. We use this anonymised analytics data to help us improve our website by understanding the pages our visitors are interested in, the geographical locations they are visiting from, and the devices they are using etc.

An IP address is a number that is assigned to your device automatically when you access the internet. Our school website does not collect IP addresses.

Our website provider uses a limited number of cookies. Cookies are small text files that are stored in your web browser for various periods of time, ranging from the duration of your browsing session (session cookie) to several months (persistent cookie). The cookies used by our website provider cannot be used to identify you personally. Their purpose is to make the site work better. You are able to manage and/or delete these files as you wish.

Where we use feeds from other websites such as Facebook and Twitter, these websites may place cookies on your device when you are watching or viewing these pages.

For further information, including information on exactly what cookies are used by our website and how you can set and control their acceptance or otherwise see our Cookie Policy.

Data Retention, Storage and Security

We will only retain your personal data for a period necessary for us to comply with the purpose for which you provided it to us (and where appropriate, for a limited period thereafter to address any

subsequent follow-on). The precise retention period will be influenced by the nature of your query. Further information on our approach to data retention is available in our Data Protection Policy. You are also free to exercise your “right to erasure” at any time (also known as the “right to be forgotten”, see below).

We employ security measures to protect personal data from access by unauthorised persons and to guard against unlawful processing, accidental loss, destruction and damage. We will do our best to ensure that all records we hold remain secure in line with our obligations under GDPR and the Irish Data Protection Act 2018. We take our security responsibilities seriously, employing the most appropriate physical and technical measures, including staff training and awareness. These security procedures are subject to regular review.

In the event that your data may be transferred (e.g. for storage or back-up purposes) to servers outside the European Economic Area (EEA) we will ensure that this is done in compliance with the appropriate GDPR safeguards ensuring protection and privacy of your personal data. Further information on our approach to data transfers is available in our Data Protection Policy.

Your Rights

You are entitled to see the information we hold about you. On written request, we will supply copies of your personal data including whatever data you may have supplied to us through your use of our website. If you wish to exercise this right then please do so by completing an “Access Request Form”, a copy of which can be obtained by contacting St. Michael’s College at Ailesbury Road, Dublin 4.

If you believe that St. Michael’s College holds inaccurate information about you, you can request that we correct that information. In certain circumstances, you may also request that data which you have supplied via our website be deleted. To exercise these rights please contact the school and we will supply you with a Data Rectification/Erasure Form for this purpose.

If you are concerned about how your personal data is processed by our website, then please do not hesitate to bring these concerns to our attention using the contact details below: Mr Tim Kelleher, Senior School Principal, St. Michael’s College, Ailesbury Road, Dublin 4, E: tkelleher@stmc.ie

Comprehensive information on all your rights is provided in our school Data Protection Policy. This includes your right to contact the Irish Data Protection Commission www.dataprotection.ie should you to feel dissatisfied with how we have addressed a complaint or concern that you have raised.

Changes to this Privacy Statement

Any changes to this Website Privacy Statement will be posted on this website. If at any time we propose to use Personal Data in a manner significantly different from that stated in this Website Privacy Statement, or otherwise disclosed to you at the time it was collected, we will notify you by e-mail, and you will have a choice as to whether or not we use your information in the new manner.

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