

# Skillnet Ireland Trainee Data Privacy Notice



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## 1. Introduction

### 1.1. About Skillnet Ireland

Skillnet Ireland funds and facilitates training through Networks and Schemes of private sector companies, in a range of sectors and regions. Each Network or Scheme delivers training that is relevant to specific industry sectors or regions and member company needs. Skillnet Ireland is mandated by the Department of Further and Higher Education, Research, Innovation & Science (DFHERIS), to monitor and evaluate training programmes provided by our Networks and Schemes, and to ensure that funds are being used appropriately.

The training programme you attended or are attending has been fully or partially funded by Skillnet Ireland. Skillnet Ireland is mandated by DFHERIS to monitor and evaluate training programmes provided by our Partners (Networks and Schemes) and to ensure that funds are being used appropriately. We request personal data only where there is a contractual requirement, or it is needed to perform our functions or to comply with our legal obligations.

You are asked to complete the “**Employed Trainee Profile Form**” and “**Unemployed Trainee Profile Form**”, where you are asked to share certain personal details about your background. You are asked to complete the “**Reaction to Learning Form**” when you have completed your training with us. You may wish to review this Data Privacy Notice before completing these forms so that you are aware of how we comply with Data Protection Legislation in relation to your personal data.

### 1.2. About the Trainee Privacy Notice

This Trainee Data Privacy Notice outlines how Skillnet Ireland collects, processes, and protects your personal data in connection with training programmes funded by DFHERIS, through us. It relates to data collected on our behalf by Skillnet Networks and Schemes in the “**Employed Trainee Profile Form**” and “**Unemployed Trainee Profile Form**”, and the “**Reaction to Learning Form**”. The information provided within this Data Privacy Notice is for guidance purposes only and does not constitute legal advice or analysis.

All Skillnet Ireland employees and contractors are required to comply with this Privacy Notice when they process personal data on our behalf. Any failure by Skillnet Ireland employees or parties contracted to Skillnet Ireland, to comply with the data protection rules (including as they are outlined in this Data Privacy Notice) may result in disciplinary action or sanction.

Please note that we may disclose individuals’ information to trusted third parties for the purposes set out and explained in this document. We require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line with the GDPR and as outlined in [Appendix 5.3: Data Protection Principles](#).

Please also note that you have the right to refuse to share your data. However, if you do not provide us with your personal data, we may not be able to provide you with our services or respond to any questions or requests you submit to us via our website.

### 1.3. Data Protection Legislation & Compliance

In Ireland, the Data Protection Commission (DPC) oversees compliance with EU Data Protection Legislation framework, which includes General Data Protection Regulation (GDPR), the Data Protection Acts 1988 and 2003, Data Protection Act 2018 and ePrivacy Regulations 2011 (the Framework). The Framework governs all activities we engage in regarding the processing of personal data and compliance is mandatory.

Skillnet Ireland is registered as a data controller. All Skillnet Ireland employees, contractors, Networks and Schemes are required to comply with our Data Protection Policies and procedures when they process personal data on our behalf. Any failure to comply with the data protection rules may result in disciplinary action or sanction.

Skillnet Networks or Schemes may be either a Data Controller, or Data Processor. They must notify you of their controller/processor status when you apply for a training programme. Networks or Schemes who are registered as Data Controllers will provide you with their Data Privacy Notice and details of their Data Protection Officer.

For further information on Data Controllers and Processors, please refer to [Appendix 5.4: Definitions](#).

### 1.4. Our Obligations

Skillnet Ireland is committed to achieving the highest standards of compliance with the EU Data Protection Legislation Framework. As part of this commitment, we will ensure that your personal data is:

- Obtained fairly and with your knowledge.
- Used only for the purpose for which it was collected.
- Handled and stored securely.
- Kept only as long as is necessary.
- Never shared with third parties without your consent.

### 1.5. Changes to the Data Privacy Notice

This Data Privacy Notice may change from time to time and any changes to the Notice will be posted on this page. The last revision of this Data Privacy Notice was April 2024.

### 1.6. Contact us

Skillnet Ireland has appointed a Data Protection Officer (DPO) to monitor compliance with our data protection obligations and with this policy and our related policies. If you have any questions about this policy or about our data protection compliance, please contact the DPO using the details below.

Name	Jennifer Walsh
Telephone	+ 353 87 167 9255
Email	dpo@skillnetireland.ie
Post	5th Floor, Q House, Furze Road, Sandyford, Dublin 18, D18 E268

## 2. Data Processing Activities

Data Processing Activities describes the personal data that we collect in connection with our services and functions, why we are collecting this data, our lawful basis for processing this data and the length of time we retain this data. Skillnet Ireland processes personal data for the purposes set out in this data privacy notice and for any other purposes specifically permitted by the DPAs (or when applicable, the GDPR) or as required by law.

### 2.1. Lawful basis for collecting and processing personal data

The lawful basis for processing your personal data is 'necessary legitimate interest'. Skillnet Ireland has conducted a 'necessary legitimate interests' balancing test which involved identifying the 'necessary legitimate interests' of us (the data controller), the data subjects, data processors, DFHERIS, and the interests of the public.

Skillnet Ireland needs to collect personal information to effectively carry out our everyday business functions and activities, to comply with relevant laws, and to provide our services. Skillnet Ireland is mandated by DFHERIS to effectively monitor the performance of the training programmes funded or partially funded by Skillnet Ireland. We perform compliance reviews, evaluations of the training programmes, and quality assurance and attendance at training verifications.

### 2.2. Information we may collect and process.

Skillnet Ireland processes personal data for the purposes set out in [Appendix 5.1: Data Processing Activities](#) and for any other purposes specifically permitted by this Data Privacy Notice, our Data Processing Agreements with Skillnet Networks and Schemes, the EU Data Protection Framework, or as required by law. This information is collected from you by Skillnet Networks and Schemes through our "**Employed Trainee Profile Form**" and "**Unemployed Trainee Profile Form**" and "**Reaction to Learning Form**", which can be completed in hard copy or electronically. Your information will be stored only for as long as necessary.

### 2.3. How we use personal data we collect

When you share your data with us, it will not be disclosed to any other third parties without your consent. We will store your personal data only for as long as necessary for the purposes and legal basis set out at the time of collection. Data collected by Skillnet Networks and Schemes is uploaded to Sonrai database, which is managed by Skillnet Ireland.

Following course completion, the Skillnet Network or Scheme you engaged with may contact you using the contact details provided to collect feedback about the course and any benefits that might have resulted from your participation. Please note that many Skillnet Networks and Schemes are also Data Controllers and have their own privacy policies. They may request your consent to contact you about their future training programmes.

### 2.4. Recipients of your personal data

Your personal data will only be shared with a restricted number of Network or Scheme employees, relevant Skillnet Ireland employees and DFHERIS for the purpose of reporting on program outcomes. Those who access your data can only do so for the purpose of managing the funding programme. Your personal data will be stored securely in line your permissions as set out at the time of collection and will not be shared with Third Parties without your consent.

## 2.5. Retention of your personal data

We will only keep your data for as long as is necessary. [Appendix 5.1: Data Processing Activities](#) sets out the lawful basis and length of time for which we will keep your personal data. After this time, your personal data is anonymised for statistical and reporting purposes. Every effort is made to ensure that these data cannot be used to identify you.

## 2.6. Security of your personal data

We take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. We have procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction.

## 2.7. Data Storage

Skillnet Ireland operates and manages a bespoke database 'Sonrai' to store your personal data. 'Sonrai' is a cloud-based solution and information is hosted in a North European Data Centre that uses the Microsoft Azure platform to securely store our data. The file server is backed up to the cloud and backups are located in a datacentre in Slough, UK. All data uses AES-256-bit encryption. After 2 years, data stored on Sonrai is anonymised and the aggregated data is retained for statistical and reporting purposes.

We maintain data security by protecting the confidentiality, integrity, and availability of the personal data, defined as follows:

- **Confidentiality** means that only people who are authorised to use the data can access it.
- **Integrity** means that personal data should be accurate and suitable for the purpose for which it is processed.
- **Availability** means that authorised users should be able to access the data if they need it for authorised purposes.

We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction, or damage. The data you provide to us is transferred to an application which is protected using SSL (Secure Sockets Layer) technology. SSL is the industry standard method of encrypting personal information and credit card details so that they can be securely transferred over the Internet.

## 2.8. Marketing

You can 'opt-in' to receive updates and information from Skillnet Ireland on both the services and achievements of our Skillnet Networks. The 'opt-in' process is explicit and is obtained only through a clear and affirmative action. When you 'opt-in', we record and save the first name and email you input. Your 'consent' can be withdrawn at any time using the 'unsubscribe' option in the footer of any correspondence received from us.

## 2.9. Cookies

The Skillnet Ireland website use cookies associated with Google Analytics (GA4), known as Google Signals, which provides code to collect information about how visitors use our site. When you 'opt in' to our Cookie Policy anonymised data about how you use our site is collected, this includes data about where visitors have come from, what pages they viewed and how long they spend on the site. For more information, please refer to Skillnet Ireland's Cookie Policy.

#### 2.10. Links to other sites

From time to time our website, social media posts or emails may contain links to and from other websites. Please note that if you follow a link to any of those websites, those websites have their own privacy policies and we do not accept any responsibility or liability for those policies. Please check those policies before you submit any personal data to those websites.

#### 2.11. Transfers outside the EEA

Where there is a need to share your personal data with any suppliers who are deemed to be outside the EEA, we will do so based on European Commission approved standard contractual clauses. Skillnet Ireland will always ensure that there are appropriate safeguards in place to protect your personal data. We currently use a third-party supplier based in Northern Ireland as our partner in carrying out compliance activities.

### 3. Data Subject Requests

Under the GDPR and Data protection Acts 1988 to 2018, you have the right to request access to your data, for your data to be corrected or erased, to object to your data being processed. For more information on your rights, please refer to [Appendix 5.2: Your Rights](#). Skillnet Ireland has appointed a Data Protection Officer (DPO) to monitor compliance with our data protection obligations and with this policy and our related policies.

#### 3.1. Making a request

If you would like to make a Data Subject Request verbally or in writing, [please contact our DPO](#) or complete the [Data Subject Request Form](#). Your request should include the following:

- your contact details,
- a note that the request is being made under the General Data Protection Regulation,
- the type of request being made (access, objection, erasure, correction),
- as much information as possible about the request so that we can accurately identify your data,
- written permission if someone is making a request on your behalf,
- proof of identity to validate that the requester is the data subject or has been granted permission to act on behalf of the data subject, and
- what format you wish to receive any records released, such as paper or electronic copy.

#### 3.2. Responding to a request

We will respond to all valid requests within one month, unless it is particularly complicated or you have made repeated requests in which case we will respond, at the latest, within three months. We will inform you of any such extension within one month of receipt of your request, together with the reasons for the delay.

For all data subject requests, proof of identity is required to verify that the requester is the data subject or acting on behalf of the data subject. We accept copies of your National ID Card, driving licence or passport. Additionally, in certain circumstances we may request additional proof, such as a utility bill that is not older than 3 months. You will not be charged a fee to exercise any of your rights unless your request is clearly unfounded, repetitive, or excessive, in which case we will charge a reasonable fee in the circumstances or refuse to act on the request.

Your request will be acknowledged within five working days. A response to your request will be given within month of receipt of the request. Large or numerous requests may result in an extension of no more than two further months. In this case, Skillnet Ireland shall inform you of any extension and the reasons for the delay within one month of receipt of the initial request. However, we will always do our best to respond to your request as quickly as possible.

If Skillnet Ireland decides not to act on your request, Skillnet Ireland must inform you without delay and, at the latest, within one month of receipt of your request, of the reasons for not acting, and your right to lodge a complaint with a supervisory authority.

### 3.3. Fees

Your request will be dealt with free of charge. However, where requests from a data subject are considered 'manifestly unfounded or excessive' Skillnet Ireland may charge a reasonable fee, considering the administrative costs of providing the information/ taking the action requested; or refuse to act on your request.

Manifestly unfounded or excessive requests include unnecessary repeat requests by an individual, or the problems associated with identifying and/or gathering the data are too great.

### 3.4. Complaints

Data subjects have the right to make a complaint at any time to a data protection supervisory authority in relation to any issues related to our processing of their personal data. As our organisation is in Ireland and we conduct our data processing here, we are regulated for data protection purposes by the [Irish Data Protection Commissioner](#).

If you have any concerns, or wish to make a complaint, you can contact the Data Protection Commissioner as follows:

- Go to their website [www.dataprotection.ie](http://www.dataprotection.ie)
- Phone on +353 87 103 0813
- Email [info@dataprotection.ie](mailto:info@dataprotection.ie)
- Postal address: Data Protection Commission, 21 Fitzwilliam Square Dublin 2, D02 RD28.



## 4. FAQ's

### Why do I need to provide personally identifiable information to Skillnet Ireland?

Skillnet Ireland may request personally identifiable information to avoid duplication of records and ensure that we can link any additional supports directly to you.

### How is my information collected?

Skillnet Networks and Schemes collect your data using our **“Trainee Profile Form”** and **“Reaction to Learning Form”**, which can be completed in hard copy or electronically.

### How long will my data be stored?

Your information will be stored only for as long as necessary, as set out in [Appendix 5.1: Data Processing Activities](#)

### How will my information be used?

Skillnet Ireland processes personal data for the purposes set out in [Appendix 5.1: Data Processing Activities](#)

### Who will see my information?

Your personal data will only be shared with a restricted number of Network or Scheme employees, relevant Skillnet Ireland employees. It will not be disclosed to any other third parties without your consent.

### Do I have to make a written request or use the online form?

You have the right to make a request verbally or in writing. We offer the option of making a written request using our online form to ensure we have as much information as we need to act on your request quickly.

### How can I make a data access or data processing request?

You can submit a subject access request by [contacting our DPO](#). Please also note that separate requests may need to be made to the Skillnet network or Scheme who originally collected your data on our behalf.

### Can someone else make a request on my behalf?

Yes, you can ask someone else to request data on your behalf, for example, a relative, friend or solicitor. However, we must have your permission to do this in the form of a signed letter authorising the person to write to us for your data and to receive a reply and proof of identity for both you and your nominated representative.

### How soon will I receive a reply?

Your request will be acknowledged within five working days. A response to your request will be given within month of receipt of the request. Large requests may result in an extension of two further months. However, we will always do our best to respond to your request as quickly as possible.

### How much does a request cost?

Your request will be dealt with free of charge unless they are considered ‘manifestly unfounded or excessive’.

### Why do I need to provide proof of identity to make a request?

Proof of identity is an added measure to protect your data. It is required where we need to reasonably establish that you that you are the data subject, or are acting on behalf of the data subject, and have the authority to make the request.

### How can I make a complaint or appeal a decision?

Complaints and appeals can be submitted directly to the [Irish Data Protection Commissioner](#).



## 5. Appendix

### 5.1. Data Processing Activities

#### Processing Activities

What we collect	Why we collect it	How long we store it
<b>Reaction to Learning Form</b> First name and last name (surname) Contact details (phone number and email address) Your feedback on the quality of training received.	To contact you following completion of your training programme. To conduct compliance, monitoring or evaluation activities.	3 years from the end of the calendar year after the completion of your training programme. After 2 years, your data is anonymised and can no longer be used to identify you.
<b>Employed and Unemployed Trainee Profile Form</b> First name and last name (surname) Contact details (phone number and email address) Gender County of Residence Age range NQF Level Achieved Employment details (Employer and occupation, or length of time Unemployed)	To validate your identity. To register you as a Trainee. For grouped evaluation of the quality and impact of training. For statistical reporting to DFHERIS. For grouped statistical reporting in the Skillnet Ireland Annual Report and other publications.	3 years from the end of the calendar year after the completion of your training programme. After 2 years, your data is anonymised and can no longer be used to identify you.
<b>Marketing</b> First name Contact details (Email address)	To send you updates and information from Skillnet Ireland on the services and achievements of Skillnet Ireland and our Skillnet Networks and Schemes.	Skillnet Ireland mailing lists are revised every 5 years. You can unsubscribe at any time using the 'unsubscribe' option in the footer of emails received from us.

#### Lawful basis

##### Legal basis for collecting data

Legitimate interests, Consent

## 5.2. Your Rights

Your Rights	What it means
The right to be informed	You have the right to be informed about how your personal data is being collected, processed, and stored.
The right of access	You have the right to request a copy of personal data we hold
The right to rectification	You have the right to request correction of inaccurate or incomplete personal data held by us.
The right to erasure (Right to be forgotten)	<p>You have the right to request that your personal data be erased where:</p> <ul style="list-style-type: none"> <li>- You withdraw your consent (where the processing was based on consent).</li> <li>- You object to processing (see Right to Object below).</li> <li>- The personal data have been unlawfully processed.</li> <li>- To comply with a legal obligation.</li> </ul> <p>However, this right does not apply where, for example, the processing is necessary to comply with a legal obligation, or for the establishment, exercise, or defence of legal claims.</p>
The right to restrict processing. (Right to request that your data is held, but not used)	<p>You have the right to request that processing of your personal data is restricted, where-</p> <ul style="list-style-type: none"> <li>- The accuracy of the personal data is contested,</li> <li>- The processing is unlawful, but you do not want it erased,</li> <li>- We no longer need the personal data, but you require it for the establishment, exercise, or defence of legal claims, or</li> <li>- You have objected to the processing and verification as to our overriding legitimate grounds is pending.</li> </ul> <p>However, we can continue to use your personal data:</p> <ul style="list-style-type: none"> <li>- Where we have your consent to do so,</li> <li>- For the establishment, exercise, or defence of legal claims,</li> <li>- To protect the rights of another, or</li> <li>- For reasons of legitimate public interest.</li> </ul>
The right to data portability	You have the right to receive your personal data in a structured, commonly used and machine-readable format, and to transmit the data to another organisation.
The right to object	<p>You have the right to object to the processing of your personal data in those cases where</p> <ul style="list-style-type: none"> <li>- we are processing your personal data in reliance on our legitimate interest,</li> <li>- for the performance of a task carried out in the public interest, or</li> <li>- in the exercise of our official authority.</li> </ul> <p>In such a case, we will stop processing these data until and unless we can demonstrate legal or legitimate grounds for processing that overrides the individuals' legitimate interest, rights and freedoms.</p>
The right not to be subject to automated decision making	You have the right not to be subject to automated decision-making, including profiling, unless certain conditions are met.
Complaints	You have the right to make a complaint to the Data Protection Commission.



### 5.3. Data Protection Principles

As outlined in Article 5 of the GDPR, seven data protection principles apply to Skillnet Ireland:

Principle	What it means
Lawfulness, fairness, and transparency	Data processing must be legal, transparent, and fair to the individual whose data is being processed.
Purpose Limitation	Data must only be collected for a specific, explicit, and legitimate purpose, and not further processed in a way that is incompatible with that purpose.
Data Minimisation	Only the necessary amount of data should be collected and processed for the purpose stated.
Accuracy:	Data must be accurate and kept up to date, with any inaccuracies corrected or promptly erased.
Storage Limitation	Data should not be kept for longer than is necessary for the purpose it was collected and should be securely deleted when no longer needed.
Integrity and Confidentiality	Data must be kept secure and protected against unauthorised access, alteration, or destruction.
Accountability	Data controllers are responsible for complying with these principles and must be able to demonstrate their compliance with appropriate documentation and procedures.

## 5.4. Definitions

Term	What it means
“Data Controllers”	People or organisations who determine the purposes of how and why any personal data is processed; make independent decisions in relation to the personal data and may otherwise control that personal data.
“Data Processors”	People or organisations who process personal data on behalf of the controller.
“Data Subject”	A living person who is identifiable or identified directly or indirectly using an “Identifier” or “Personal Data.”
GDPR	The GDPR will apply by default to most personal data processing, but in Ireland further rules on certain issues (for example the reasons for, and extent to which, data subject rights may be restricted) are set out in the Data Protection Acts 1988 to 2018
“Personal Data” or an “Identifier”	Any information about a living person where that person is or can be reasonably identified. Personal data can include. <ul style="list-style-type: none"> <li>- a name, address, or phone number,</li> <li>- description of physical characteristics,</li> <li>- date of birth or age range,</li> <li>- an opinion about that person, including their actions and behaviour,</li> <li>- information that captures a data subjects’ image or voice, (photo, video or audio recording that is processed electronically),</li> <li>- location data or meta data stored electronically</li> </ul>
“Sensitive Personal Data” or “Special Category Data”	Data that records a living person’s <ul style="list-style-type: none"> <li>- racial or ethnic origin,</li> <li>- political opinions,</li> <li>- religious or philosophical beliefs,</li> <li>- trade union membership,</li> <li>- genetic data,</li> <li>- biometric data,</li> <li>- health data or</li> <li>- data relating to sexual orientation.</li> </ul> <p>The processing of sensitive personal data is prohibited without explicit consent.</p>
“Processing” .	Changes to or movement of personal or sensitive data, including collecting, storing, retrieving, consulting, sharing and erasing except in situations where this processing is done for personal or household activities
“Necessary Legitimate Interest”	The GDPR allows for the use of personal data where its purpose is necessary, legitimate and is not outweighed by the interests, fundamental rights, or freedoms of data subjects. This is known as the ‘necessary legitimate interests’ legal basis for processing personal data.

