



Association of Retired Commissioned Officers
Data Protection and Privacy Policy – July 2018
Modified – March and June 2021

Introduction

The purpose of the Association of Retired Commissioned Officers Data Protection and Privacy Policy, (hereafter referred to as “ARCO”), is to protect the rights, privacy and personal information of individuals in accordance with the Data Protection Acts, 1988 - 2018, and the European Union’s General Data Protection Regulation (GDPR) which became effective from 25th of May 2018.

For more information on GDPR visit the EU Site: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679>

For more information on Data Protection Act 2018 visit the Irish Statute Book Site: <http://www.irishstatutebook.ie/eli/2018/act/7/enacted/en/index.html>

In addition to routine governance, the Association’s Data Protection and Privacy Policy also covers ARCO’s website, emails and texting service.

ARCO collects and or uses personal information for the following purposes:

- Membership of the Association,
- Governance of the Association,
- Communications to the Association’s membership and
- Statistical purposes.

Supervisory Authority

- **Data Controller:** The individual appointed by the Executive Committee as the Association’s Hon Secretary.
- **Data Protection Officer:** The individual appointed by Executive Committee as the Association’s Membership Secretary. (GDPR2018 Articles 37-39, DPA2018 Para 88)

Personal Information

Personal information is obtained from voluntary membership application forms. Personal information may include Pension Number or Standing Order, Service Number, Rank, Name, Address, Email Address, Home Phone Number, Mobile Phone Number, Military Service Particulars on Retirement (Corps / Staff / Unit and Year) and authorisation for deduction of ARCO Annual Subscription from member’s Defence Forces Pension or Standing Order creation.

Personal Information concerning a deceased member, or non-member, may be provided by a spouse or family member in relation to seeking advice or information concerning pension entitlements following the death of an officer.



Limited data on ex-members, as follows, is retained by ARCO for statistical purposes: Pension Number or Standing Order, Service Number, Rank, Name, Military Service Particulars on Retirement (Corps / Staff / Unit and Year) and date joined ARCO.

Membership

ARCO securely keeps personal information and records of all current members and only uses this information for membership and subscription purposes. Uses include: to notify members and to deal with any issues relating to Annual General Meetings, Regional Meetings, subscriptions and renewals, to supply notices, newsletters and other information relating to ARCO's objectives and activities, and to aggregate such data in respect of current and former members for statistical purposes.

Application Forms

Annually, completed ARCO Membership Application Forms are deposited in Military Archives, Cathal Brugha Barracks as part of the audit.

The personal contact information of ex-members contained in their Application Forms is redacted at the end of each year.

Disclosure

With the exception of the following, ARCO will not disclose personal information to third parties:

- Pensions Section, Department of Defence for the deduction of annual subscriptions,
- The Department of An Taoiseach, the Department of Defence, Defence Forces Headquarters and other Organisations, e.g., the Alliance of Retired Public Servants, ONE, IUNVA in response to invitations to attend ceremonial events, meetings or other activities, containing the names and contact details of the Officers, members of the EXCOM and nominated ARCO members.
- Defence Forces Headquarters in respect of ARCO members who convey expressions of interest for the Defence Forces Mentoring Programme.
- The commander of a military installation in order to facilitate entry to that installation, which is hosting an activity organised by ARCO.

Business Contacts

ARCO securely maintains names and contact details of persons with whom it has business relationships such as Government officials and military personnel, Representative Associations and Veterans' Associations, as appropriate.

Governance

All personal information voluntarily provided by members to ARCO will be treated with the highest standards of security and confidentiality, in accordance with EU regulations and Irish legislation pertaining to data handling.



Principles for Data Protection Management

ARCO

- Obtains the personal information fairly, for the purposes as described above.
- Uses and discloses such information only in the circumstances necessary for the purposes for which it collects the data.
- Processing of personal information is by consent and the right to withdraw consent.
- Whether in paper files or in electronic format, the Association keeps information secure, to ensure that no unauthorised person has access to it.
- Keeps records as accurate, complete and as up-to-date as possible.
- Does not ask for, nor keep any information not required, for its purposes.
- Retains personal data only for as long as is necessary for the satisfactory performance of ARCO's functions.
- Archives limited personal data of ex-members for statistical purposes.
- Will provide to a member, on request, particulars of his / her personal information held by ARCO.
- Does not maintain personal information of individuals accessing its website.

ARCO's Website

The content of ARCO's website is for general information purposes only. The posting of personal information on the website is by consent, e.g., nominal roll of former and current Officers and Executive Committee.

ARCO will never attempt to identify a user of its website, or to associate a user's technical data to a particular individual.

Apart from information volunteered through ARCO's website Contact Us Section, which will not be provided to third parties, ARCO does not retain any personal information of visitors accessing the website.

Emails and Text Messages

Individuals receiving emails or Text Messages from ARCO can withdraw consent by contacting the Data Protection Officer, or Controller.

Individual Photographs

Where appropriate, individual photographs posted on ARCO's website and newsletter will have prior consent.

Photographs from an official photographer, accredited by the event organiser, may be posted on ARCO's website, or in ARCO's newsletter. ARCO assumes that photographs taken by accredited photographers have the prior consent of the individual present at such events.

Individuals whose photographs are posted on the Association's website can withdraw consent by contacting ARCO's Data Protection Officer or Controller.



Annual Audit

The Data Protection Officer will conduct an annual Data Protection and Privacy audit in respect of each year ending 31 December and present the audit summary at the following Executive Committee meeting. This audit includes the editing of ex-members personal data records retained for statistical purposes and depositing completed ARCO Membership Application Forms in Military Archives, Cathal Brugha Barracks. In addition, the Data Protection Officer will liaise with the ARCO Treasurer to ensure that Standing Orders of deceased members have been terminated before contact details are deleted.

Data Protection and Privacy Queries or Complaints

Queries or complaints in connection with the processing of personal data can be lodged by:

- **Website:** Through the “Contact Us Secretary” Section.

EXCOM

25 June 2021

END