



DATA PROTECTION POLICY

1. PURPOSE

This Data Protection Policy sets out how Dublin Cultural Institute collects, uses, stores, shares, and protects personal data in accordance with applicable data protection legislation.

DCI is committed to ensuring that personal data is processed lawfully, fairly, transparently, and securely.

2. SCOPE

This policy applies to: All staff, teachers, contractors, and volunteers - All personal data relating to students, staff, partners, suppliers, and visitors - All formats of personal data (electronic, paper, verbal)

3. DATA CONTROLLER

The School acts as the Data Controller for personal data it processes in the course of its activities.

Responsibility for data protection compliance rests with senior management, supported by a designated Data Protection Officer.

4. DEFINITIONS

- Personal Data: Any information relating to an identified or identifiable individual
 - Special Category Data: Sensitive data such as health information or safeguarding records
 - Processing: Any operation performed on personal data (e.g. collection, storage, use, disclosure)
 - Data Subject: The individual to whom the personal data relates
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5. DATA PROTECTION PRINCIPLES

The School processes personal data in accordance with the following principles:

1. Lawfulness, fairness, and transparency
 2. Purpose limitation
 3. Data minimisation
 4. Accuracy
 5. Storage limitation
 6. Integrity and confidentiality (security)
 7. Accountability
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6. LAWFUL BASES FOR PROCESSING

The School processes personal data using one or more of the following lawful bases: - Performance of a contract (e.g. student enrolment) - Legal obligation (e.g. safeguarding, immigration compliance) - Public task (education and welfare) - Legitimate interests (administration, quality assurance) - Consent (where required)

Special category data is processed in accordance with additional legal conditions.

7. CATEGORIES OF PERSONAL DATA



Dublin Cultural Institute
The School may process the following categories of data: - Student and applicant data (identity, contact details, attendance, academic records) - Parent/Guardian contact details - Staff and contractor data (HR, payroll) - Partner and supplier contact details - Safeguarding and welfare information (where necessary)

8. DATA SHARING AND THIRD PARTIES

Personal data may be shared with third parties where necessary, including: - Education agents - Examination and accreditation bodies - Accommodation and transport providers - IT and cloud service providers - Regulatory and safeguarding authorities

All third-party processing is governed by appropriate agreements, including Data Processing Agreements where required.

9. INTERNATIONAL DATA TRANSFERS

Where personal data is transferred outside EU, the School ensures appropriate safeguards are in place, such as: - Adequacy regulations - Standard Contractual Clauses or International Data Transfer Agreements

10. DATA SECURITY

The School implements appropriate technical and organisational measures to protect personal data, including: - Secure IT systems and access controls - Antivirus and firewall protection - Encryption where appropriate - Staff training and awareness

11. DATA RETENTION

Personal data is retained only for as long as necessary for its intended purpose and in line with the School's Records Retention Policy. Data is securely deleted or destroyed when no longer required.

12. DATA SUBJECT RIGHTS

Individuals have the right to: - Access their personal data - Request rectification or erasure - Restrict or object to processing - Request data portability - Withdraw consent (where applicable)

Requests should be made in writing and will be handled within statutory timeframes.

13. DATA BREACHES

All actual or suspected data breaches must be reported immediately to management. The School maintains a Data Breach Response Procedure and will notify the ICO and affected individuals where legally required.

14. STAFF RESPONSIBILITIES

All staff are required to: - Follow this policy and related procedures - Handle personal data securely and confidentially - Complete data protection training - Report concerns or breaches promptly

Failure to comply may result in disciplinary action.

15. POLICY REVIEW

This policy is reviewed annually and updated as necessary to reflect legal or operational changes.



Dublin Cultural Institute

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Approved by: Jonathan Duignan

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