



ÚDARÁS UCHTÁLA na hÉIREANN
THE ADOPTION AUTHORITY of IRELAND

General Data Protection Policy

for

The Adoption Authority of Ireland

Revision and Approval History					
Version	Revised By	Revision Date	Approved By	Approval Date	Comments
Draft	DPO	04/04/19			
Reviewed	DPO	16/01/2020			
Reviewed	Mathesons	30/10/2020			
Reviewed	DPO	26/01/2021			
Reviewed	Board	2nd March 2021			

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1 Introduction

This Policy sets out the obligations of the Adoption Authority of Ireland (the “**Adoption Authority**”) regarding data protection and the rights of data subject (“**data subjects**”) in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation (“**GDPR**”).

The GDPR defines “personal data” as any information relating to an identified or identifiable natural person (a “**data subject**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

This Policy sets the Adoption Authority’s obligations regarding the collection, processing, transfer, storage, and disposal of personal data. The procedures and principles set out herein must be followed at all times, by staff/employees, board members, agents, contractors, or other parties working on behalf of the Adoption Authority.

A number of terms used in this policy are outlined in greater detail in the ***Glossary of Data Protection Terms***.

2 The Statutory Obligations of the Adoption Authority

The Adoption Authority is a statutory body established under the Adoption Act 2010 (as amended) and has a number of obligations in relation to certain categories of information which it holds, which due to the nature of its statutory purpose, includes sensitive forms of personal data (including, in some instances) special category personal data.

The Adoption Authority’s obligations under the Adoption Act 2010 (as amended) must be taken into account when processing personal data. If you have any queries or concerns in relation to how these obligations of the Adoption Authority impact upon any aspect of this policy, contact the data protection officer.

3 The Data Protection Principles

This Policy aims to ensure compliance with the GDPR. The GDPR sets out the following principles with which any party handling personal data must comply. All personal data must be:

1. Processed lawfully, fairly, and in a transparent manner in relation to the data subject.
2. Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall however not be considered to be incompatible with the initial purposes.
3. Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

4. Accurate and, where necessary, kept up to date. Every reasonable step will be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay.
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of the data subject.
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

4 The Rights of Data Subjects

The GDPR sets out the following rights applicable to data subjects (please refer to the parts of this policy indicated for further details):

- The right to be informed (Part 11).
- The right of access (Part 12);
- The right to rectification (Part 13);
- The right to erasure (also known as the 'right to be forgotten' or 'Consent & Withdrawal policy') (Part 14);
- The right to restrict processing (Part 15);
- The right to data portability (Part 16);
- The right to object (Part 17);

5 Lawful, Fair, and Transparent Data Processing

The GDPR seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The GDPR states that processing of personal data shall be lawful if at least one of the following applies:

- The data subject has given consent to the processing of their personal data for one or more specific purposes;
- The processing is necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract with them;
- The processing is necessary for compliance with a legal obligation to which the data controller is subject;
- The processing is necessary to protect the vital interests of the data subject or of another natural person;

- ***The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller; or***
- The processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

The Adoption Authority has set out for each processing activity that it carries out, the legal basis on which it relies, but will, when possible use Article 6 (1) (e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

If the personal data in question is “special category data” (also known as “sensitive personal data”) (for example, data concerning the data subject’s race, ethnicity, politics, religion, trade union membership, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation), at least one of the following conditions must be met:

- The data subject has given their explicit consent to the processing of such data for one or more specified purposes;
- The processing is necessary for the purpose of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment, social security, and social protection law;
- The processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
- The data controller is a foundation, association, or other non-profit body with a political, philosophical, religious, or trade union aim, and the processing is carried out in the course of its legitimate activities, provided that the processing relates solely to the members or former members of that body or to persons who have regular contact with it in connection with its purposes and that the personal data is not disclosed outside the body without the consent of the data subjects;
- The processing relates to personal data which is clearly made public by the data subject;
- The processing is necessary for the conduct of legal claims or whenever courts are acting in their judicial capacity;
- The processing is necessary for substantial public interest reasons, on the basis of EU or EU Member State law which shall be proportionate to the aim pursued, shall respect the essence of the right to data protection, and shall provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject;
- The processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of an employee, for medical diagnosis, for the provision of health or social care or treatment, or the management of health or social care systems or services on the basis of EU or EU Member State law or pursuant to a contract with a health professional, subject to the conditions and safeguards referred to in Article 9(3) of the GDPR;

- The processing is necessary for public interest reasons in the area of public health, for example, protecting against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare and of medicinal products or medical devices, on the basis of EU or EU Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject (in particular, professional secrecy); or
- The processing is necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes in accordance with Article 89(1) of the GDPR based on EU or EU Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection, and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

6 Specified, Explicit, and Legitimate Purposes

The Adoption Authority collects and processes the personal data set out in the Records of Processing Activities maintained by the Adoption Authority that includes:

- Personal data collected directly from data subjects; and
- Personal data obtained from third parties.
- We only collect, process, and hold personal data for the specific purposes set out in the Records of Processing (or for other purposes expressly permitted by the GDPR).
- Data subjects are kept informed at all times of the purpose or purposes for which we use their personal data.
- Adequate, Relevant, and Limited Data Processing.

We will only collect and process personal data for and to the extent necessary for the specific purpose or purposes of which data subjects have been informed (or will be informed).

7 Accuracy of Data and Keeping Data Up-to-Date

We will ensure that all personal data collected, processed, and held by us is kept accurate and up-to-date. This includes, but is not limited to, the rectification of personal data at the request of a data subject, as set out in Part 13, below.

The accuracy of personal data will be checked in so far as possible when it is collected and at regular intervals thereafter. If any personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

Employees are required to inform the Adoption Authority in the event of an update to personal data so that our records are accurate and current.

8 Data Retention

We will not keep personal data for any longer than is necessary in light of the purpose or purposes for which that personal data was originally collected, held, and processed.

When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.

For full details of our approach to data retention please refer to our **Data Retention and disposal Policy**. For information relating to retention periods for specific personal data types held by the Adoption Authority, please refer to our **Records of Processing Activities**.

9 Accountability and Record-Keeping

The Adoption Authority's Data Protection Officer is currently Heather Connolly.

The Data Protection Officer will be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy; the Adoption Authority's other data protection-related policies, and with the GDPR and other applicable data protection legislation.

We will keep written internal records as part of our compliance with Art 30 of the GDPR of all personal data collection, holding, and processing, which shall incorporate the following information:

- The name and contact details of the Adoption Authority, the Data Protection Officer, and any applicable third-party data processors;
- The purposes for which we collect, hold, and processes personal data;
- Details of the categories of personal data collected, held, and processed by us, and the categories of data subject to which that personal data relates;
- Categories of recipients to whom the personal data have been or will be disclosed;
- Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards;
- Details of how long personal data will be retained by us (please refer to the Adoption Authority's **Data Retention and disposal Policy**); and the **Records of Processing Activities**.
- Detailed descriptions of all technical and organisational measures taken by us to ensure the security of personal data.

10 Data Protection Impact Assessments

We shall carry out Data Protection Impact Assessments for any and all new projects and/or new uses of personal data where the processing involved is likely to result in a high risk to the rights and freedoms of data subjects under the GDPR, in particular if such processing involves the use of new technology.

Data Protection Impact Assessments shall be examined and overseen by the Data Protection Officer and will address the following:

- The type(s) of personal data that will be collected, held, and processed;
- The purpose(s) for which personal data is to be used;
- Our objectives;
- How personal data is to be used;

- The parties (internal and/or external) who need to be consulted;
- The necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed;
- Risks posed to data subjects;
- Risks posed both within and to the Adoption Authority; and
- Proposed measures to minimise and handle identified risks.

For full details of our approach to Data Privacy Impact Assessments and Privacy by Design, please refer to our ***Policy on Privacy by Design and Data Privacy Impact Assessments***.

11 Keeping Data Subjects Informed

Where personal data is collected directly from data subjects, those data subjects will be informed of its purpose at the time of collection; and how it will be collected, processed, and stored, and for what purposes.

This will be completed by way of providing data subjects with a privacy notice. The Adoption Authority maintains privacy statements for:

- Employees;
- Data subjects using its website; and
- Service Users.

12 Data Subject Access

Data subjects may make subject access requests (“SARs”) at any time to find out more about the personal data which we hold about them, what we are doing with that personal data, and why.

Data subjects wishing to make a SAR may do so in writing or by telephone, they may use the Adoption Authority’s Subject Access Request Form (if preferred) available on the Adoption Authority website (or available on request) or other written communication. We reserve the right to request suitable ID from subjects.

Any SARs received from data subjects should be forwarded to the Adoption Authority’s Data Protection Officer or emailed to dataprotection@aai.gov.ie

Responses to SARs will be made within one month of receipt, however, this may be extended by up to two months if the SAR is sufficiently complex and/or numerous requests are made. If such additional time is required, the data subject will be informed within one month of receipt of the SAR.

All SARs received shall be handled by the Adoption Authority’s Data Protection Officer.

The Adoption Authority does not charge a fee for the handling of normal SARs. We reserve the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

For full details of our approach to data subject access request, please refer to our ***Data Subject Access Request Policy***.

13 Rectification of Personal Data

Data subjects have the right to require the Adoption Authority to rectify any of their personal data that is inaccurate or incomplete.

We undertake to rectify the personal data in question, and inform the data subject of that rectification, within one month of the data subject informing the Adoption Authority of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject will be informed within one month of receipt of the rectification request.

In the event that any affected personal data has been disclosed to third parties, those parties will be informed of any rectification that must be made to that personal data.

14 Erasure of Personal Data

Data subjects have the right to request that the Adoption Authority erases the personal data it holds about them in the following circumstances:

- If It is no longer necessary for us to hold that personal data with respect to the purpose(s) for which it was originally collected or processed;
- The data subject wishes to withdraw their consent to us holding and processing their personal data in restricted circumstances;
- The data subject objects to us holding and processing their personal data (and if there is no overriding legitimate interest to allow us to continue doing so) (see Part 17 of this Policy for further details concerning the right to object);
- The personal data has been processed unlawfully;
- The personal data needs to be erased in order for the Adoption Authority to comply with a particular legal obligation.

Unless we have reasonable/legitimate/legal grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed within one month of receipt of the deletion request.

In the event that any personal data that is to be erased in response to a data subject's request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

For full details of the Adoption Authority's approach to data erasure or withdrawal of consent please refer to our **Consent and Withdrawal Policy**.

15 Restriction of Personal Data Processing

Data subjects may request that the Adoption Authority ceases processing the personal data it holds about them, as long as one of the following applies:

- the accuracy of personal data has been contested by a data subject, in which case the restriction of such data will only apply for a period to allow the rectification of the personal data;
- the processing is unlawful and the data subject wishes for the processing to be restricted rather than having the affected personal data be deleted;
- the Adoption Authority no longer has any requirement or purpose to hold the personal data but the data subject requires it for the establishment, exercise or defence of legal claims; or
- the data subject objects to the processing of personal data based on the public interest or the legitimate interest of the Adoption Authority and the data subject requests the restriction of processing subject to an evaluation of whether the legitimate grounds of the controller override those of the data subject.

If a data subject makes such a request, we will retain only the amount of personal data concerning that data subject (if any) that is necessary to ensure that the personal data in question is not processed further.

In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

For full details of the Adoption Authority's approach to data erasure please refer to our ***Policy on Restriction of processing***.

16 Data Portability

Where the processing of personal data is otherwise required for the performance of a contract between us and the data subject, data subjects have the right, under the GDPR, to receive a copy of their personal data and to use it for other purposes (namely transmitting it to other data controllers).

Where technically feasible, if requested by a data subject, personal data will be sent directly to the required data controller.

All requests for copies of personal data will be complied with within one month of the data subject's request. The period can be extended by up to two months in the case of complex or numerous requests. If such additional time is required, the data subject will be informed within one month of receipt of the deletion request.

For full details of the Adoption Authority's approach to data portability please refer to our ***Policy on Data Portability***.

17 Objections to Personal Data Processing

Data subjects have the right to object to the Adoption Authority processing their personal data based on legitimate interests, direct marketing (including profiling), and processing for scientific and/or historical research and statistics purposes.

Where a data subject objects to the Adoption Authority processing their personal data based on its legitimate interests, we shall cease such processing immediately, unless it can be demonstrated that our legitimate grounds for such processing override the data subject's interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.

Where a data subject objects to the Adoption Authority processing their personal data for direct marketing purposes, we will cease such processing immediately.

Where a data subject objects to us processing their personal data for scientific and/or historical research and statistics purposes, the data subject must, under the GDPR, "demonstrate grounds relating to his or her particular situation". We are not required to comply if the research is necessary for the performance of a task carried out for reasons of public interest.

18 Secure Processing

We shall ensure that all personal data collected, held, and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction, or damage. The technical and organisational measures taken to protect personal data are set out in Part 19 to 22 below.

19 Data Security - Transferring Personal Data

We will ensure that the following measures are taken with respect to all communications and other transfers involving personal data:

- All emails containing personal data will be marked "confidential";
- Personal data will only be transmitted over secure networks; transmission over unsecured networks is not permitted in any circumstances;
- All personal data required to be transferred physically, whether in hardcopy form or on removable electronic media shall be transferred in a suitable container/cover marked "confidential".

20 Data Security - Storage

We will ensure that the following measures are taken with respect to the storage of personal data:

- All electronic copies of personal data should be stored securely using passwords;
- All hard copies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet, or similar;
- All personal data stored electronically will be securely backed up

- Personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Adoption Authority where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the GDPR (which may include demonstrating to us that all suitable technical security and organisational measures have been taken).

21 Data Security - Use of Personal Data

We will ensure that the following measures are taken with respect to the use of personal data:

- No personal data may be shared informally and if an employee, agent, sub-contractor, or other party working on behalf of the Adoption Authority requires access to any personal data that they do not already have access to they must contact the data protection officer.
- Personal data will be handled with care at all times and will not be left unattended or on view to unauthorised employees, agents, sub-contractors, or other parties at any time;
- If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user will lock the computer and screen before leaving it; security settings will be implemented to lock screen if left unattended for longer than 3 minutes.

22 Data Security - IT Security

We will ensure that the following measures are taken with respect to IT and information security:

- All passwords used to protect personal data should be changed regularly and will not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols. All software used by the Adoption Authority is designed to require such passwords.
- Under no circumstances will any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of the Adoption Authority, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords; All software (including, but not limited to, applications and operating systems) will be kept up-to-date. The Adoption Authority's IT staff shall be responsible for installing any and all security-related updates after the updates are made available by the publisher or manufacturer.

23 Organisational Measures

We will ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

- *Awareness* – All board members, employees, agents, contractors, or other parties working on behalf of the Adoption Authority will be:
- made fully aware of both their individual responsibilities and the Adoption Authority's responsibilities under the GDPR and under this Policy, and will be provided with a copy of this Policy; and

- if responsible for the handling of personal data, required and encouraged to exercise care, caution and discretion when discussing work related matters that relate to personal data, whether in the workplace or otherwise;
- *Access Limited by Purpose* – Only board members, employees, agents, sub-contractors, or other parties working on behalf of the Adoption Authority that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to any personal data held by us;
- *Training* - All board members, employees, agents, contractors, or other parties working on behalf of the Adoption Authority handling personal data will be appropriately trained to do so;
- *Ongoing Evaluation* – Methods of collecting, holding, and processing personal data will be regularly evaluated and reviewed; All personal data held by us will be reviewed periodically, as set out in the Data Retention and disposal Policy;
- *Supervision* – The performance of those agents, contractors, or other parties working on behalf of the Adoption Authority handling personal data will be regularly evaluated and reviewed;
- *Contractual Obligation* – All employees, agents, contractors, or other parties working on behalf of the Adoption Authority handling personal data will be bound to do so in accordance with the principles of the GDPR and this Policy by contract;

24 Record of Processor Relationships

The Adoption Authority will maintain a Data Processor Register that is routinely reviewed and updated by the DPO.

The purpose of the Data Processor Register is to operate as a record of activities where:

- the Adoption Authority performs personal data processing functions on the instruction of a separate Data Controller; and
- other bodies perform personal data processing functions on the instructions of the Adoption Authority.

The Register will also confirm the existence of a Data Processing Agreement (or “DPA”) between the Adoption Authority and the Data Controller, or between the Adoption Authority and the Processor (as appropriate).

The DPA will outline the scope of duties and responsibilities of the Processor in the data processing relationship and will set out the policies and protocols pursuant to which the Adoption Authority, or the relevant Processor, will process personal data.

25 The Authority’s responsibilities as a Processor

The Adoption Authority will ensure there is a DPA in place in each circumstance where:

- the Adoption Authority performs personal data processing functions on the instruction of a separate Data Controller; and

- other bodies perform personal data processing functions on the instructions of the Adoption Authority.

In addition to any obligations or responsibilities set out under a relevant DPA, the Adoption Authority will have certain additional obligations if it acts as a processor on behalf of a separate Data Controller.

Under Article 33(2) of the GDPR, the Adoption Authority is required to notify controllers of a Personal Data Breach without “undue delay” after becoming aware of it. Where the Adoption Authority acts as processor it will notify the Data Controller without undue delay upon becoming aware of a Personal Data Breach affecting Personal Data, providing the Data Controller with sufficient information to allow them to meet any obligations to report or inform Data Subjects of the Personal Data Breach under the Data Protection Laws.

In addition, where the Adoption Authority acts as a processor it will also co-operate with the Data Controller and take such reasonable commercial steps to assist in the investigation, mitigation and remediation of each such Personal Data Breach.

26 Transferring Personal Data to a Country Outside the EEA

We may from time to time transfer (‘transfer’ includes making available remotely) personal data to countries outside of the EEA.

The transfer of personal data to a country outside of the EEA will take place only if one or more of the following applies:

- The transfer is to a country, territory, or one or more specific sectors in that country (or an international organisation), that the European Commission has determined ensures an adequate level of protection for personal data;
- There are appropriate safeguards in place to ensure an adequate level of protection for personal data in the form of (i) a legally binding agreement between public authorities or bodies; binding corporate rules; (ii) standard data protection clauses adopted by the European Commission; (iii) compliance with an approved code of conduct approved by a supervisory authority (e.g. the Data Protection Commission); (v) certification under an approved certification mechanism (as provided for in the GDPR); (vi) contractual clauses agreed and authorised by the competent supervisory authority; or (vii) provisions inserted into administrative arrangements between public authorities or bodies authorised by the competent supervisory authority;
- The transfer is made with the informed consent of the relevant data subject(s);
- The transfer is necessary for the performance of a contract between the data subject and the Adoption Authority (or for pre-contractual steps taken at the request of the data subject);
- The transfer is necessary for important public interest reasons;
- The transfer is necessary for the conduct of legal claims;
- The transfer is necessary to protect the vital interests of the data subject or other individuals where the data subject is physically or legally unable to give their consent; or

- The transfer is made from a register that, under Irish or EU law, is intended to provide information to the public and which is open for access by the public in general or otherwise to those who are able to show a legitimate interest in accessing the register.

For full details of our approach to international transfers please refer to our ***Policy on International Transfers of data***.

27 Data Breach Notification

All personal data breaches will be reported immediately to the Adoption Authority's Data Protection Officer.

If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection Officer will ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.

In the event that a personal data breach is likely to result in a high risk to the rights and freedoms of data subjects, the Data Protection Officer will ensure that all affected data subjects are informed of the breach directly and without undue delay.

For full details of our approach to personal data breaches please refer to our ***Policy on Incident Management for Personal Data Breaches***.

28 Implementation of Policy

This Policy shall be deemed effective as of 2nd March 2021. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by the Board of the Adoption Authority:

Name: Patricia Carey

Position: CEO, Data Controller

Date: 2nd March 2021

Due for Review by: DPO

Appendix A - Full List of GDPR Policies

Policy	Article of the GDPR
Data Retention Policy	Articles 5(1)(e), 13(1), 17, 30
Data Subject Access Rights	
Data Subject Access Request Policy	Article 15
Data Rectification Policy	Article 16
Data Erasure Policy	Article 17 & 19
Policy on Data Portability	Article 20
Data Consent and Withdrawal Policy	Article 7
Policy of Restriction of processing	Article 18 & 19
Personal Data Breach's	
Data Breach Incident Management Policy	Article 33 & 34
Miscellaneous Policies	
Policy on Lawful Data Processing	Article 6
DPIA Policy	Article 35
Privacy by Design Policy	Article 35
Policy on International Transfers of Data	Article 44

Appendix B – Sample Data Processing Agreement Register

Name and contact details		Data Protection Officer (if applicable)	
Name	The Adoption Authority of Ireland	Name	Heather Connolly
Address	Shelbourne House, Shelbourne Road, Ballsbridge, Dublin Do4 R6F6	Address	Shelbourne House, Shelbourne Road, Ballsbridge, Dublin Do4 R6F6
Email	corporate@aai.gov.ie	Email	dataprotection@aai.gov.ie
Telephone	01 2309 3000	Telephone	01 2309 348 085 8797069

Date	Name of Controller	Name of Processor	Date of Data Processing Agreement	Link to contract with processor	Additional obligations or special arrangements