

## Data Protection Privacy Notice (CWHT-DP-02)

### 1. What is Personal Data?

Personal data is data about a living individual who can be identified from that data. The processing of personal data is governed by the EU General Data Protection Regulation (EU 2016/679) and the Data Protection Acts 1988-2018.

### 2. Who are we?

The Construction Workers' Health Trust (CWHT) and Construction Workers Benevolent Trust (CWBT) are registered charities (Registered Charity Numbers 20031060 and 20013172 respectively).

CWHT is the data controller (contact details below) which means that CWHT decides how your personal data is processed and for what purposes.

CWHT is committed to protecting your privacy and we have appropriate policies and procedures in place to process and protect any personal data that we hold about you.

### 3. How do we process your data?

CWHT complies with its legal obligations by using personal data only for specified, lawful purposes; by not collecting or retaining excessive amounts of data; by keeping personal data up to date; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

### 4. What is the legal basis for processing your personal data?

Depending on how and why you engage with CWHT we may use your personal data for the purposes set out in the following table which also sets out the legal basis(es) for processing your data:

Purpose	Legal Basis
Provision of health screening services	Explicit consent granted by the data subject (Article 9(2)(a) GDPR) Occupational health, working capacity of employee (Article 9(2)(h)) GDPR
Administering CWBT's benevolent funds	Consent granted by the data subject (Article 6(1)(a) GDPR)
Administering and promoting CWHT's services, events, news and activities	Legitimate interests
Recruitment and employment of staff	Performance of a contract (Article 6(1)(b) GDPR)

### 5. Sharing your personal data

In certain circumstances, we need to share personal data in pursuit of our legitimate interests, for example the use of processors who audit our accounts, manage communications, conduct customer surveys or store your data.

In exceptional circumstances, where a client's screening results indicate that he/she should seek immediate medical attention, CWHT will inform the Health and Safety Officer of the client's employer as the client's health status could pose a risk to his/her life or that of other persons.

### 6. International Transfer

All personal data is stored either within the European Economic Area or countries whose data protection regimes have been designated as adequate by the European Commission or, if stored elsewhere, such storage is subject to having approved, appropriate privacy safeguards in place.

## **7. How long do we keep your data?**

We keep personal data only for periods set out in our Data Retention Schedule and do not maintain data for longer than is absolutely required for the purposes set out in the table above.

## **8. Your rights and your personal data**

You have the following rights with respect to your personal data:

- To access and request a copy of your personal data, which CWHT holds about you.
- To request your personal data is erased where it is no longer necessary or lawful for CWHT to retain such data.
- To request a restriction is placed on further processing of your personal data where there is a dispute in relation to the accuracy or processing
- To request that CWHT correct any personal data if it is found to be inaccurate, incomplete or out-of-date.
- To object to the processing of personal data by CWHT.
- To request that CWHT provides you with a copy of personal data that you have provided and, in certain circumstances, to transmit that data directly to another data controller.

You also have the right to lodge a complaint with the Data Protection Commission should you be unhappy about any aspect of CWHT's handling of your personal data or any request to us.

## **9. Contact Details**

To exercise all relevant rights or submit a query or a complaint please in the first instance contact the General Manager (Data Protection Coordinator) at:

The Construction Workers' Health Trust  
Unit 39  
Lavery Ave  
Park West Industrial Park  
Dublin D12 KN36

Tel: 01 - 7093070 Email: [info@CWHT.ie](mailto:info@CWHT.ie)

## **10. Complaints**

You have the right to make a complaint to the Data Protection Commission which you can contact by phone: **1800 437 737**; via website [www.dataprotection.ie](http://www.dataprotection.ie) or by writing to:

The Data Protection Commission,  
21 Fitzwilliam Square South  
D02 RD28