



An Roinn Airgeadais
Department of Finance

Candidate Privacy Statement for Internal Competitions

Last updated 10th January 2019

Important: Candidate Privacy Statement for Internal Competitions

This Candidate Privacy Statement has been produced for candidates applying for internal competitions in the Department of Finance. Candidates are requested to familiarise themselves with this document. In addition candidates are also requested to familiarise themselves with the Department's "**Data Protection Internal Policy and Procedures document**" which can be found on the Hub, click here:

<https://finance.cloud.gov.ie/KnowledgeBase/DataProtectionPolicy/Shared%20Documents/Department%20of%20Finance%20Data%20Protection%20Policy%20%20and%20Procedures%20-%20October%202018.pdf>

1. Principles of processing of personal data

The principles relating to the processing of personal data are set out in the Department's Data Protection policy document. Personal data must be processed lawfully, fairly and in a transparent manner. There is 6 ways in which personal data can be processed lawfully i.e.

- 1) Article 6(1)(a) - Consent Basis
- 2) Article 6(1)(b) - Contract Basis
- 3) Article 6(1)(c) - Legal Obligation compliance
- 4) Article 6(1)(d) - Vital Interests
- 5) Article 6(1)(e) - Public Interest
- 6) Article 6(1)(f) - Legitimate Interests

In general, the processing of data by HR will fall under GDPR Regulation Article 6(1)(b) - Contract Basis or/and Article 6(1)(c) - Legal Obligation compliance and Section 71(2)(a) of the Data Protection Act 2018. Application data processing is covered under GDPR Regulation Article 6(1)(b) and Section 71(2)(a) of the Data Protection Act 2018.

The Department of Finance may fill vacant positions through various means including:

- Public Appointments Service panels, both open and interdepartmental
- Internal competitions
- Open Competitions for specialised posts
- Secondments
- Civil Service Mobility

When applying for a position within the Department of Finance candidates will be asked to submit a range of documents, e.g., contact information, application form, CV and/or cover letter/personal statement.

Article 6(1)(b) permits the processing of personal data where the "processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract" ("the Contract Basis"). Article 6(1)(b) may be relied upon as the legal basis for processing operations carried out;

(i) in the context of recruitment to employment; e.g. processing (i.e. receiving, copying, reviewing and storing) of job applications, references, C.Vs and interview notes and

(ii) for the purposes of administering the contract of employment; e.g. processing “onboarding” information such as emergency contact details, processing payroll data such as details of salary, PPS number, P.45 and P.60, processing of personal data for the administration of pension benefits including date of birth, civil and family status, instructions to pensions provider, processing data relating to the employee’s performance at work and many of the processing activities.

2. Sharing of information

Recipient/Shared With	Comment
Department of Finance HR Unit	Where the recruitment process is being carried out by the Department of Finance our HR unit stores your application and contact information and corresponds with you as a candidate. Should you be successful, further information will be required for inclusion in your contract and to create your personnel file and put you on our payroll.
Selection Board	Information such as application form/CV and cover letter is shared with the selection board for the shortlisting and interview process. Contact information is not shared with the selection board and is retained by Department of Finance HR. When the selection/interview process is complete, the Board will return all of the records relating to each candidate.
Public Appointments Service (PAS)	Where the recruitment process is being carried out by PAS, PAS receive all applications. On appointment to the Department of Finance, PAS will provide your CV/application form along with your contact details and PPSN to the Department of Finance HR Unit. On occasion dates of births are also included.
Your current Employer	PAS may seek information relating to your service, performance, sick leave and reference checks.
Department of Finance Management	Application data may also be used for statistical analysis. For this purpose the data will be aggregated and anonymised to protect all personal data.

3. Article 30 Report

Under Article 30 of the GDPR, the Department, as a data controller, is required to maintain a record of the following:

- the name and contact details of the controller, where applicable, the joint controller, the controller's representative and the data protection officer;
- the purposes of the processing of personal data;
- a description of the categories of data subjects and of the categories of personal data;
- the categories of recipients to whom the personal data have been or will be disclosed, including recipients in third countries;
- where applicable, transfers of personal data to a third country or an international organization, including the identification of that third country or international organization and, in the case of transfers referred to in the second paragraph of Article 49(1), the documentation of suitable safeguards;
- the envisaged time limits for erasure of the different categories of data;
- where possible, a general description of the technical and organizational security measures referred to in Article 32 (1) of the GDPR.

The Department's Article 30 Report can be accessed in the Data Protection 'Knowledge site' on The Hub:

<https://finance.cloud.gov.ie/KnowledgeBase/DataProtectionPolicy/Shared%20Documents/Article%2030%20Report%20-%20Dynamic%20document%20August%202018.pdf#search=Article%2030%20Report>

The Department's DPO will review the Article 30 Report on an annual basis or when advised of additional personal data held by the Department not previously included in the Report.

4. Data Retention policy

With the commencement of GDPR the Department is obliged to produce a Data Retention policy. This policy is being completed to complement the Department's Records Management Policy and the Data Protection Internal Policy and Procedures, by providing general guidance on the length of time that it is appropriate to retain records created, collected, controlled and processed by the Department, and ultimately on either the disposal or archiving of records.

5. Candidates Entitlements

The GDPR provides data subjects with a number of rights - these are set out in the Department's internal Data Protection Policy and Procedures document, and include the following:

ACCESS: Candidates can request and receive access to their data at any time and can request and receive a copy of this data, in electronic/transferable format.

RECTIFICATION: Candidates can have any incorrect information corrected.

ERASURE: Candidates can request the data held be erased. However, if the retention period is still applicable it may not be possible to accede to any request to erase personal data.

OBJECTION: Applications can object to this information being processed.

COMPLAIN: Candidates can make a complaint to our internal Data Protection Officer “DPO” (contact details below) and/or make a complaint to the relevant authority the Data Protection Commission.

6. Contact details for the Department of Finance Data Protection Officer:

Name: Colm O’Neill
Email: dataprotection@finance.gov.ie or colm.o'neill@finance.gov.ie
Tel: 604 5818 or Ext: 5818

Postal Address: Data Protection Officer
Department of Finance
Government Buildings
Upper Merrion Street
Dublin 2
D02 R583

7. Contact Details for the Department of Finance HR Data Protection Liaison Officer

Name: Liz Doyle
Email: liz.doyle@finance.gov.ie
Tel: 01-6045793

Postal Address: HR Data Protection Liaison Officer
Department of Finance
Government Buildings
Upper Merrion Street
Dublin 2
D02 R583

8. For Further information on Data Protection:

The website of the Data Protection Commission – www.dataprotection.ie or make contact by telephone at 1890 252231 or by email on info@dataprotection.ie.

