

# Data Privacy

## E) Do we use automated analytical tools with your data?

We do not use any personally identifiable data in using analytics. Our analytical tools are only concerned with measuring standards of care against best practice on a collective and individual basis and do not associate your specific name, address, date of birth, phone number, next of kin, doctors name with the information we process automatically. A typical example would be reviewing the care provided against expected care standards, or simply, when an unidentified patient reported pain were they appropriately treated with pain treatment.

## F) Who do we share your personal data with?

- ▶ People you have specifically authorised us to share it with, and for specified purposes only
- ▶ Other departments within the NAS and HSE such as Human Resources, Finance etc.
- ▶ Statutory and regulatory bodies including law enforcement when required by law or provided for in law
- ▶ Health care professionals when we have a legal basis to do so

## G) How long do we retain your data?

- ▶ Human resource records and all associated staff data are retained for the duration of your career with NAS and for 7 years and 6 months following the termination of your employment.

## H) How you can exercise your rights in relation to your data, including the right to object?

You have the right to;

- ▶ Request details about how we process your personal data and request copies in a simple usable electronic format
- ▶ Request that incorrect or incomplete data be amended or updated
- ▶ Object to particular uses of your personal data where the processing is taking place on the grounds of a legitimate interest or in the public interest

- ▶ Request that your personal data is erased (the right to be forgotten) or its use restricted
- ▶ Withdraw consent at any time where we are using consent as the legal basis for processing

The above are not absolute rights and in certain circumstances it may not be possible to comply with your request. In these circumstances we will advise you of the reasons for our decision.

If you have a specific question about personal data we hold or may hold about you, or wish to make a Subject Access Request, please contact the Data Protection Officer at [NASGDPR@hse.ie](mailto:NASGDPR@hse.ie)

We will deal with any request in exercising your rights within a calendar month, or where your request is complex we will contact you within a month setting out how/why your request cannot be complied with within one month and setting out why it is necessary that the period for compliance be extended by a further two calendar months. If you have a complaint or concern about our use of your data, please contact us.

## I) Data Breaches

- ▶ A data breach occurs where there has been accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access to personal data
- ▶ In the event you suspect a breach has occurred you should immediately contact the Data Protection Officer
- ▶ If this happens we may be required to notify our supervisory authority (The Data Protection Commission) within 72 hours
- ▶ Depending on the nature of the breach we may also be required to notify you, if the breach affects you, or the relevant data subject(s) without undue delay
- ▶ We maintain a register of any such breaches

## Useful Links:

<https://www.hse.ie/eng/gdpr/gdpr-faq/>

<https://www.hse.ie/eng/gdpr/hse-data-protection-policy/>



## Information for NAS Staff

How we manage and protect your  
personal data



## National Ambulance Service – Data Privacy

The National Ambulance Service (NAS) takes the matter of your data safety seriously. In this leaflet we set out what personal data we collect, why we collect it, and what implications this has for you. The General Data Protection Regulation (GDPR) came into effect on the 25th of May 2018 and is directly effective, meaning it has been the law in Ireland since 25 May 2018. There is also a new Data Protection Act, 2018 (the “2018 Act”) which repeals parts of and amends existing data protection legislation in Ireland (the Data Protection Acts of 1998 & 2003). The GDPR and the 2018 Act strengthen your rights as a data subject. The GDPR also gives you more control over your personal information, including the right to object to our processing this data, the right to withdraw your consent for processing, where we are processing that data on the basis of your consent, and the right to request copies of any personal data we hold about you.

If you have a specific question about personal data we hold or may hold about you, or wish to make a Subject Access Request, please contact the **Data Protection Officer at [NASGDPR@hse.ie](mailto:NASGDPR@hse.ie)**

More general information about GDPR is available on the Data Protection Commission website [www.dataprotection.ie](http://www.dataprotection.ie), by email at [info@dataprotection.ie](mailto:info@dataprotection.ie), or telephone 1890 252 231.

The information set out in this document is of a general nature and is not an attempt to satisfy all of the information obligations the Health Service Executive owes to you under the GDPR and the Data Protection Acts 1988-2018.

What is personal data?

- ▶ Personal data is any information about a person or information from which a person could be identified. Personal data can be factual (for example, a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour.

What is processing of personal data?

- ▶ Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## A) Who are we & where do we keep your data?

The National Ambulance Service is the statutory pre-hospital emergency and intermediate care provider for the State and is a part of the Health Service Executive (the “HSE”). References to “us”, “we” & “our” in this leaflet mean the NAS/HSE. Your data is stored in the following locations

- ▶ Electronic scanned copies of payroll records relating to NAS Payroll Tullamore are securely stored by IMSCAN our Enterprise Content Management partner who are registered with the Data Protection Commission on encrypted servers
- ▶ Records processed by your local payroll department are stored in the relevant HBS Finance Department or Area Headquarters
- ▶ Payroll, attendance and other pay related claims which require the authorising of your line manager, will also be stored at the appropriate Area Headquarters in accordance with the HSE’s document retention policies
- ▶ Human Resources Files are stored in your Area Headquarters; these will contain details of Name, Date of Birth, Next of Kin, Phone numbers, email addresses, service, attendance and any disciplinary records. These files are stored securely with limited, specific and restrictive access
- ▶ Any data given by you during a call is recorded in NEOC or by NDRS and information given in these calls are stored on a securely encrypted server
- ▶ Driving Licence details are stored on the Fleetwave system
- ▶ CCTV is stored on a hard drive in each ambulance and at each ambulance station where CCTV is installed; this overwrites at intervals of 30 days unless processed in accordance with a legal basis
- ▶ Garda vetting data is not held by NAS, only the disclosure data is retained and this is held in Oak House Naas with single person access
- ▶ Data from local recruitment campaigns, temporary positions etc is only retained for the duration of the specific campaign and is securely disposed of afterwards

We do not share any of your data in a manner contrary to the requirements of the GDPR or The Data Protection Acts 1988-2018.

## B) What personal data do we collect about you?

- ▶ Data to identify you, your name, PPS number, date of birth, address, and phone number.
- ▶ Details of your next of kin (if given)
- ▶ Email address – provided by NAS for legitimate business basis
- ▶ CCTV recordings from the vehicle cameras or from our ambulance stations
- ▶ Payroll, external referrals, educational qualifications, training records, disciplinary record, attendance data, application forms for leave

## C) When do we collect this personal data?

- ▶ When you give us information, or it is shared with us on a legal basis.
- ▶ When someone else gives us information such as business division, training body etc. They will only give information which is necessary and in accordance with their own data protection obligations.

## D) What legal bases do we rely upon to process your personal data?

The GDPR states that any processing of personal data must have a legal basis. The GDPR sets out six potential legal basis on which processing can take place which we rely upon to process your personal data:

- ▶ Consent
- ▶ Contract
- ▶ Legal Obligation
- ▶ Vital Interest of Data Subject
- ▶ Public Interest or in the exercise of official authority vested in the Controller
- ▶ Legitimate Interests