

# **Reasonable Accommodation Privacy Policy**

**2023/2024**



## **Privacy Notice**

### **Introduction**

This is a statement of the practices of the Assessment Department for Reasonable Accommodation, Accounting Technicians Ireland, 47/49 Pearse Street, Dublin 2 in relation to the capture of personal data on the Reasonable Accommodation Application form that can be requested from the Assessment Department and the steps taken by Accounting Technicians Ireland (ATI) to respect your privacy.

Accounting Technicians Ireland fully respects your right to privacy and actively seeks to preserve the privacy rights of those who share information with ATI. Any personal information which you volunteer to ATI will be treated with the highest standards of security and confidentiality, in accordance with the General Data Protection Regulation (EU) 2016/679.

The privacy notice explains the following

- How we collect and use your personal data
- The purpose and legal basis for collecting your personal data
- How we store and secure personal data
- Details of third parties with whom we share personal data
- What are your rights

### **How we collect and use your personal data**

The personal data we collect from you will only be used by ATI for lawful purposes outlined in this privacy notice.

Personal data will be collected in the following way:

Electronic format – when students make a request for Reasonable Accommodation, they are required to submit their evidence of disability directly to the Assessment team by email.

Personal data will only be disclosed to other members of ATI staff when it is necessary for them to implement, improve, or review your support and this is what you are asked to consent to when registering with us. Personal data is held to assess whether it is appropriate to make reasonable accommodation and/or the nature of the reasonable accommodations to be made.

The data collected in this form will be shared with the Assessment Team and the Academic Registrar to ensure that students receive the reasonable accommodation identified for them in the ATI

If you have any queries or complaints in relation to the use of your personal data you can contact the Data Protection Advisor for ATI as follows:

Data Protection Advisor  
Accounting Technicians Ireland  
47/49 Pearse Street  
Dublin 2, Ireland. [dp@accountingtechniciansireland.ie](mailto:dp@accountingtechniciansireland.ie)

### **The purpose and legal basis for collecting personal data**

The personal data we collect will be used to provide students with reasonable accommodations identified at the needs assessment process, as this is the only way for students to receive the reasonable accommodations.

#### **Purpose:**

The personal data we collect will be used to ensure the reasonable accommodations are implemented.

#### **Legal Basis:**

The legal basis for collecting personal data is to comply with our duties under the General Data Protection Regulation (GDPR), the Disability Acts 2005, Equality Status Act 2000 (as amended) and the Employment Equality Act 1998 (as amended).

ATI will ensure that personal data is processed fairly and lawfully in keeping with the principles of data protection. For the purposes outlined in this privacy notice, personal data will be processed on the basis of your informed consent. When you register for Reasonable Accommodation you are provided with detailed information on the personal data we collect and how it will be used, as per the 'ATI Consent to Disclose Reasonable Accommodation Information form'– see appendix 1.

#### **Consent:**

You may withdraw your consent to disclose your information at any time. To withdraw your consent, we require you to advise us in writing that you are withdrawing your consent; this can be done via [dp@accountingtechniciansireland.ie](mailto:dp@accountingtechniciansireland.ie)

In order to register for Reasonable Accommodation, you are required to contact the Assessment Department directly on 01 6498181 or [exams@accountingtechniciansireland.ie](mailto:exams@accountingtechniciansireland.ie) to access the reasonable accommodation application form. If you have indicated that you wish to avail of reasonable accommodation via online registration on our website then a member of the Assessment Team will be in touch with you directly.

Full information regarding the collection and use of your data is provided to you during registration. You are required to read the 'ATI Consent to Disclose Reasonable Accommodation form'.

You will also be informed that if you do not agree to the points outlined within the ATI Consent to Disclose Reasonable Accommodation form, then you will be unable to fully register for Reasonable Accommodation and this will delay your application to receive reasonable accommodations.

Should you have any queries about the ATI Consent to Disclose Reasonable Accommodation form, you are requested to contact a member of the Assessment Team for more information.

#### **How we store and secure personal data:**

Any personal data we collect will be stored confidentially and securely as required by the ATI's Information Security Policy. ATI is committed to ensuring all accesses to, uses of, and processing of ATI data is performed in a secure manner.

In keeping with the data protection principles, we will only store personal data for as long as is necessary.

For the purposes described here we will store your data securely, as follows:

- a. Paper records/documents – the Assessment Team does not hold any paper documents and will give paper records back to the student once scanned. Paper records posted to the Assessment Team will be scanned and shredded.
- b. Electronic records: all Reasonable Accommodation documentation you provide is stored securely in the Assessment Department and are only available to the Assessment Team and the Academic Registrar. Notes on all interactions are stored on in the Assessment Department, with access limited to only the Assessment Team.
- c. Retain your data for as long as you are a registered student, in accordance with ATI's Record Management policy. It will then be securely destroyed.
- d. Statistical information gathered to monitor and evaluate the Reasonable Accommodation Service will be anonymous.

When we store your personal data on our systems the data will be stored either on the ATI premises or on secure IT platforms within the EEA, which are also subject to European data protection requirements.

### **Details of third parties with whom we share personal data:**

The Assessment Team in ATI will share your data with third parties within ATI on a need to know basis for the purposes of ensuring that you are receiving the full suite of resources available to you when you apply for reasonable accommodation.

When we share your personal data with the third parties, ATI will ensure that the data is only processed according to our specific instructions and that the same standards of confidentiality and security are maintained. Once the processing of personal data is complete any third parties with whom data was shared will be required to return the data to the Assessment Department.

### **What are your rights?**

You have the following rights over the way we process your personal data:

- **Right of Access**

You have the right to request a copy of the personal data we are processing about you and to exercise that right easily and at reasonable intervals.

- **Consent**

You have the right to withdraw your consent where that is the legal basis of our processing.

- **Rectification**

You have the right to have inaccuracies in personal data that we hold about you rectified.

- **Erasure**

You have the right to have your personal data deleted where we no longer have any justification for retaining it subject to exemptions such as the use of pseudonymised data for scientific research.

- **Object and Restrict**

You have the right to object to processing or restrict the processing of your personal data if:

- The processing is based on public interest or in order to pursue a legitimate interest
- The personal data was processed unlawfully;
- You need the personal data to be deleted in order to comply with a legal obligation

- **Portability**

You have the right to have a readily accessible machine-readable copy of your data transferred or moved to another data controller where we are processing your data based on your consent.

**Contact**

If you have any queries relating to the processing of your personal data for the purposes outlined above or you wish to make a request in relation to your rights you can contact the Data Protection Advisor on [dp@accountingtechniciansireland.ie](mailto:dp@accountingtechniciansireland.ie)

If you wish to make a complaint or escalate an issue relating to your rights you can contact the Data Protection Advisor at [dp@accountingtechniciansireland.ie](mailto:dp@accountingtechniciansireland.ie)

Finally, if you are not satisfied with the information we have provided to you in relation to the processing of your data you can also make a complaint to the Data Protection Commissioner via the link in their website [Making a Complaint to the DPC.](#)