

Group Water Scheme: GDPR Data Protection Policy

Document Control

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1. Policy Statement This Data Protection Policy outlines the commitment of the Killone Group Water Scheme (hereafter referred to as “the Scheme”) to ensuring that personal data of its members is handled in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Acts. The Scheme respects the privacy of all members and is committed to protecting their personal information.

2. Scope This policy applies to all personal data collected, stored, and processed by the Scheme, and to all staff, committee members, contractors, or volunteers who handle such data.

3. Definitions

- **Personal Data:** Information relating to an identified or identifiable person, including name, address, email, mobile number, Eircode, meter number and schedule number.

- **Data Subject:** Any individual whose data is collected by the Scheme.

- **Data Controller:** The Scheme committee which determines the purposes and means of processing personal data.

- **Data Processor:** Any third party processing data on behalf of the Scheme.

4. Data Collected: The Scheme collects the following personal data:

- Name
- Address
- Eircode
- Meter number
- Schedule number
- Landline number
- Mobile number
- Email address
- GPS location of the water meter and
- water consumption

5. Purpose of Data Collection Personal data is collected for the following purposes:

- To provide water services
- To communicate regarding service interruptions or maintenance
- For billing and administrative purposes and
- To comply with legal obligations

6. Lawful Basis for Processing: The Scheme processes personal data on the following lawful bases:

- Contractual necessity
- Legal obligation
- Legitimate interest (e.g., for efficient service delivery and safety notifications) and
- Receipt of Government subsidies for domestic connections

7. Data Subject Rights Members have the right to:

- Access their data
- Request correction of inaccurate data
- Request deletion of data (subject to legal requirements)
- Restrict or object to processing
- Lodge a complaint with the Data Protection Commission

8. Data Retention: The Scheme retains personal data only for as long as necessary to fulfil the purposes for which it was collected, and in line with legal and regulatory requirements (e.g., 7 years for billing records). The installed meter stays with the property to which it was originally assigned.

9. Data Security: The Scheme implements appropriate technical and organisational measures to safeguard personal data, including:

- Secure physical storage (e.g., locked cabinets)
- Password-protected digital files
- Restricted access to personal data

10. Data Sharing Personal data may be shared with trusted third-party service providers who support the Scheme's operations (e.g., Clare County Council), under strict contractual obligations to protect the data.

11. Data Breach Procedure In the event of a data breach:

- The Scheme will assess and contain the breach
- Notify the Data Protection Commission within 72 hours if required
- Inform affected individuals when necessary
- Document the breach and response

12. Data Protection Contact For any queries or data access requests, members can contact:

Data Protection Contact Person: Chair, Murt Redington or Manager, Michael Coughlan

Email: killonegws@gmail.com

Phone: Phone Number: 087 245 5253

13. Review and Updates This policy will be reviewed annually or in response to significant changes in data processing activities or applicable law.

Approved by: Murt Redington

Date: July 2025

Next Review Date: July 2026

This document may be supplemented by protocols and procedures for specific operations such as breach response, data access requests, and retention/disposal procedures.