



Privacy Policy – Employees and Service Providers and Host Families

Introduction

ELI Schools is committed to protecting your privacy and respecting your rights as an employee. This Privacy Policy explains what personal data we collect about you, why we collect it, how we use it, and your rights regarding your data.

This policy applies to all current and former employees, contractors, and volunteers at ELI Schools.

Important: This is a summary of our employment data practices. Our full data protection procedures are outlined in the Data Protection Policy – Employees and Data Protection Governance Framework, available upon request.

1. Who Are We?

Organization: ELI Schools (LT Education Abroad Limited)

Address: 7 Herbert Place, Dublin 2, D02EH93, Ireland

Data Protection Contact: Peter Hutchinson **Email:** peter@elischools.com

For data protection questions or to exercise your rights, contact Peter Hutchinson using the details above.

2. What Personal Data Do We Collect?

When you apply to work at ELI Schools or during your employment, we collect personal data including:

Contact and Biographical Information

- Full name
- Address
- Phone number
- Email address
- Date of birth
- Nationality
- Emergency contact details
- Next of kin information

Employment Information (if relevant)

- Job title and role
- Department
- Employment contract and terms
- Start date and employment history
- Resignation or termination date
- Employment status (full-time, part-time, freelance, volunteer)



Educational and Professional Qualifications

- Qualifications (CELTA, DELTA, Master's degrees, etc.)
- Certificates and transcripts
- Professional memberships
- Continuing Professional Development (CPD) records
- Teaching qualifications

Vetting and Background Information

- **Garda Vetting:** Criminal background check (if working with under-18s or as required)
- References from previous employers

Host Family Information (relevant to host families)

- Personal information about family or others living in the home
- Date of birth and age
- Occupation or education status

Payroll and Financial Information

- Bank account details (for salary payment)
- Salary and payment terms
- Tax identification number
- PRSI number
- Insurance information
- Expense claims and reimbursements

Performance and Development Information

- Teaching observations and performance evaluations
- Annual appraisals
- Professional development plans
- CPD participation records
- Course attendance and certifications
- Performance metrics (e.g., student feedback scores)

Health and Welfare Information (if disclosed)

- Medical conditions or disabilities (only if you choose to disclose)
- Sick leave records
- Occupational health reports
- Mental health or wellbeing support (if requested)
- Reasonable accommodation requirements

Disciplinary and Grievance Information (if applicable)

- Complaints or grievances raised
- Disciplinary proceedings
- Warnings or sanctions
- Appeals or investigations

Communications

- Work emails
- Workplace communications (Teams, Slack, etc.)
- Letters, memos
- Meeting notes

Other Information

- Attendance records
- Time and attendance data
- Holiday requests and approvals
- Social media activity (if it relates to your role or company representation)
- Photographs or videos (for company events, training, or branding)



3. Why Do We Collect Your Data?

We collect and use your personal data for the following employment and business reasons:

To Recruit and Employ You

- Processing your job application
- Conducting interviews and selection
- Verifying qualifications and references
- Conducting Garda vetting (mandatory for working with children)
- Drafting employment contracts
- Onboarding and induction

To Manage Your Employment

- Paying your salary and benefits
- Tax and PRSI compliance
- Pension administration
- Administering holiday and leave
- Managing work schedules and attendance
- Providing workplace services and facilities

To Develop Your Career

- Identifying training needs
- Arranging CPD and professional development
- Supporting career progression
- Performance management and appraisals
- Feedback and coaching

To Manage Performance and Quality

- Teaching observations and classroom monitoring
- Student feedback collection about your teaching
- Performance assessments
- Quality assurance monitoring
- Addressing performance concerns

To Comply with Legal Requirements

- **Employment Law**
- **Tax:** Recording financial information for revenue compliance
- **Health and Safety**
- **Child Protection Data Protection**

To Support Your Health and Wellbeing

- Managing sick leave
- Providing occupational health support
- Arranging reasonable accommodations
- Responding to welfare concerns
- Employee assistance programmes

To Manage Discipline and Complaints

- Investigating complaints or grievances
- Managing disciplinary procedures
- Documenting incidents
- Protecting legal interests

For Legal and Business Protection

- Keeping records for legal claims or disputes
- Protecting company interests
- Risk management
- Audit and compliance



4. Legal Basis for Using Your Data

We only use your personal data when we have a legal reason to do so:

Reason	Legal Basis
Recruiting and employing you	Contract (employment agreement)
Paying salary, tax, PRSI, pension	Legal obligation; Contract
Garda vetting (for child protection)	Legal obligation (Children First Act 2015)
Performance management	Contract; Legitimate interest (managing quality)
Teaching observations	Contract; Legitimate interest (quality assurance)
Health and safety records	Legal obligation
Occupational health	Legal obligation; Consent (if you voluntarily participate)
Safeguarding records (if applicable)	Legal obligation (child protection)
Discipline and grievances	Contract; Legitimate interest (managing workplace)
Other HR administration	Contract
Host Family Records	Application, Records of placements, Payments and Payment Information



5. How Long Do We Keep Your Data?

We keep your personal data only as long as necessary:

Data Type	Retention Period	Reason
Employment records (contracts, qualifications, references)	7 years after employment ends	References, legal claims, queries
Payroll records (salary, tax, PRSI, bank details)	7 years after tax year	Tax law requirement
Performance records (observations, appraisals, CPD)	7 years after employment ends	References, queries, documentation
Disciplinary/Grievance records	7 years after case closed	Legal protection, accountability
Health and wellbeing records	7 years after employment ends	Occupational health, legal
Safeguarding records (if working with children)	Longer retention or indefinite	Legal obligation, child protection
Communications (emails, Teams)	Varies (typically deleted within months unless significant)	As appropriate; email backups may retain longer
CCTV/Security footage	30 days (unless incident, then longer)	Security purposes

After retention periods expire, your data is securely deleted or destroyed.



6. Who Do We Share Your Data With?

We share your personal data with the following parties only when necessary:

Government and Authorities

- **Revenue:** For tax compliance and PRSI reporting
- **Department of Enterprise, Trade and Employment:** For employment law compliance
- **Tusla (Child and Family Agency):** If there are child protection concerns (safeguarding data)
- **Gardaí:** If there is a criminal matter or investigation
- **External Service Providers**
- **Payroll Services:** If payroll is outsourced (with data protection agreements)
- **IT and Cloud Providers:** Companies hosting our systems and data (with data protection agreements)
- **Insurance Provider:** For occupational health and liability insurance (with data protection agreements)
- **Occupational Health Services:** If you use our occupational health support (with data protection agreements)
- **Background Checking/Vetting Services:** National Vetting Bureau (for Garda vetting)

Externally

- **Students and Customers**
- We provide students with basic data about host families and teachers for the purpose of arriving and staying in their homes (host families) and when providing information about their courses (teachers) and staff

Within ELI Schools

- **Management Team:** For performance management, HR matters, and strategic decisions
- **Your Line Manager:** For direct management of your work
- **HR Manager:** For HR administration
- **Colleagues:** On a need-to-know basis for work purposes
- **Legal and Compliance**
- **Legal Advisors:** If there is a legal dispute or investigation
- **Auditors:** For financial audits and compliance
- **Accreditation Bodies:** Anonymized data about staff qualifications (QQI, EAQUALS)

We DO NOT:

- Sell your data to third parties
- Use your data for marketing purposes without consent
- Share your data more widely than necessary
- Share disciplinary or health information without justified reason



7. Your Rights

Under data protection law, you have the following rights regarding your personal data:

Right to Access Your Data

You have the right to request a copy of all personal data we hold about you. We will provide this within one month, free of charge.

How to request: Email Peter Hutchinson at peter@elischools.com or submit a written request.

Right to Correct Your Data

If any of your personal data is inaccurate or incomplete, you can request correction. We will correct it promptly.

How to request: Contact Peter Hutchinson with details of what needs correcting.

Right to Erase Your Data ("Right to be Forgotten")

In some circumstances, you can request deletion of your personal data. However, we may need to keep it for legal, tax, or employment reasons.

How to request: Contact Peter Hutchinson at peter@elischools.com

Note: We must keep your employment records for 7 years after your employment ends for legal and tax purposes, so we may not be able to delete immediately.

Right to Restrict Processing

You can ask us to limit how we use your data in certain circumstances (e.g., while we verify accuracy).

How to request: Contact us with details of what restrictions you want.

Right to Data Portability

You can request your personal data in a structured, commonly used electronic format that you can transfer elsewhere.

How to request: Contact Peter Hutchinson.

Right to Object

You can object to certain uses of your data, particularly:

- Marketing or unsolicited communications
- Profiling or automated decision-making
- Processing based on legitimate interests

Right Not to Be Subject to Automated Decision-Making

You have rights regarding decisions made about you solely by automated systems. We don't make significant automated employment decisions about you.

How to Exercise Your Rights

To exercise any of these rights, contact:

Peter Hutchinson Email: peter@elischools.com **Phone:** [Phone number] **Address:** 7 Herbert Place, Dublin 2, D02EH93

We will respond to your request within one month. If you believe your rights haven't been respected, you can lodge a complaint with the Data Protection Commission (see section below).



8. Security Of Your Data

We take the security of your personal data seriously. We use appropriate technical and organizational measures to protect your data from unauthorized access, loss, or misuse:

- **Encrypted systems:** Sensitive payroll and personal data is encrypted
- **Access controls:** Only authorized staff can access your data (role-based access)
- **Secure storage:** Data stored on secure servers with encrypted backups
- **Password security:** Strong password policies; multi-factor authentication where possible
- **Staff training:** All staff trained on data protection, security, and confidentiality
- **Physical security:** Premises secured; restricted access to areas holding personal data
- **Clear desk policy:** Staff keep sensitive data secured when not in use; lock screens when away
- **Secure communication:** Encrypted email for sensitive information; secure file transfer methods
- **Data breach procedures:** Immediate containment and notification procedures in place

However, no method of transmission over the internet is 100% secure. While we do our best, we cannot guarantee absolute security.

9. International Transfers

Your personal data may be transferred outside the European Union/European Economic Area (EU/EEA) in limited circumstances:

- **Payroll or HR services:** If we use service providers with servers outside the EU/EEA
- **IT hosting:** Cloud services may store data internationally
- **Professional development:** External training providers may be outside the EU/EEA

When we transfer data internationally, we ensure appropriate safeguards are in place (such as Standard Contractual Clauses) to protect your data under data protection law.

10. Changes To This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, or legal requirements. We will notify you of significant changes via email.

Last Updated: March 2026 **Next Review:** March 2027

11. Your Responsibilities

As an employee, you also have responsibilities regarding data protection:

- **Comply with data protection policies** outlined in the Data Protection Policy – Employees
- **Keep passwords secure:** Use strong passwords; never share passwords
- **Protect personal data:** Don't leave documents with personal data unsecured; lock your screen when away
- **Maintain confidentiality:** Treat confidential information as confidential
- **Report concerns:** If you suspect a data breach, misuse of data, or security weakness, report immediately
- **Complete training:** Participate in data protection training
- **Don't misuse data:** Don't access data outside your job responsibilities; don't use company data for personal purposes



12. Questions Or Complaints

Questions About Your Data

If you have questions about how we use your data, contact:

Peter Hutchinson Email: peter@elischools.com **Phone:** [Phone number]

We aim to respond within 5 working days.

Complaints to ELI Schools

If you believe your data protection rights haven't been respected, you can lodge a complaint with us. Contact Peter Hutchinson using the details above. We will investigate and respond within one month.

Complaints to the Data Protection Commission

If you're not satisfied with our response, or wish to lodge a complaint directly, you have the right to lodge a complaint with the **Data Protection Commission:**

- **Data Protection Commission Website:** www.dataprotection.ie
- **Phone:** +353 (0)578 684 800 **Email:** info@dataprotection.ie
- **Postal Address:** Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23, Ireland

You can also lodge a complaint with the Data Protection Commission directly without first complaining to us.

ACKNOWLEDGMENT

By accepting employment at ELI Schools, you acknowledge that you have received, read, and understood this Privacy Policy and the Data Protection Policy – Employees. You consent to the collection, use, and processing of your personal data as described herein, subject to your statutory rights.