

The National HSE Steps to Health Challenge

Privacy Policy

Introduction

The National HSE Steps to Health challenge is a Staff Health and Wellbeing initiative organised by the Steps to Health Working Group. The Steps to Health Challenge aims to encourage more staff to start walking and to hopefully take it up as a lifetime habit. The Health Service Executive (HSE) owns and runs the <https://www.hse.ie/stepschallenge/> website. The HSE needs to collect and use certain information about you when you use any of the HSE's online services. As part of the challenge we use a number of surveys to gather data for processes like registration, competitions and the exit survey. The HSE is committed to protecting your privacy and takes the security of your information very seriously.

The HSE aims to be clear and transparent about the information we collect about you and how we will use that information.

This policy will set out the following:

- The Data Controller
- The Data Protection Officer (DPO)
- What Personal Data we Collect
- What we use your Personal Data for
- How long will we hold onto your Personal Data
- Who will have access to your Personal Data
- International data transfers
- Your Rights
- Complaints

The Data Controller

The Health Service Executive (HSE) is the Data Controller for all personal data which is collected and used by the <https://www.hse.ie/stepschallenge/> website. A Data Controller is the legal entity which determines how and why personal data is collected and used.

The HSE's headquarters is located at Dr. Steevens Hospital, Steevens Lane, Dublin 8, Ireland (www.hse.ie).

The Data Protection Officer (DPO)

The HSE has appointed a Data Protection Officer to oversee the HSE's compliance with its data protection obligations. The HSE Data Protection Officer (DPO) can be contacted directly, here:

Email address: dpo@hse.ie

What Personal Data we Collect

Personal data means any information relating to you which allows the HSE to identify you, such as your name & address, contact phone numbers and email address.

Most areas of the <https://www.hse.ie/stepschallenge/> website can be accessed by you without the need for you to provide any of your personal data. We use surveys that require you to submit your name, email address, and other contact details, for example when you register for the 'Steps to Health Challenge 2019' or 'Opt-in for weekly newsletters' or 'Exit Survey'.

The HSE may collect and use the following personal data about you:

- Your name, address, contact telephone number, and email address
- Your IP address
- The communications you exchange with the HSE as part of your participation in 'Steps to Health 2019'
- Information about your use of this website

What we use your Personal Data for

Any personal data we collect from you on this website will only be used by the HSE for the following purposes:

- To distribute various HSE newsletters and information notices regarding HSE health campaigns and promotions which the HSE feels may be of benefit to you.
- To send you information on future Health and Wellbeing initiatives that may be of interest to you.
- To gain your feedback on this website.
- The information collected by the surveys will be used by the HSE Healthy Eating & Active Living Programme to inform an evaluation of the HSE Steps to Health Challenge, and may be published in anonymised or aggregated format.

How long will we hold onto your Personal Data

The HSE will only retain your personal data for as long as it is necessary to fulfil the purpose it is being processed for. All personal data collected by the HSE is retained in accordance with the HSE Record Retention Policy. The HSE Record Retention Policy is published on the HSE website at: www.hse.ie/eng/services/yourhealthservice/info/dp/recordretpolicy.pdf [\(doesn't work\)](#)

When the HSE no longer needs your personal data, they securely delete or destroy your personal data.

Who will have access to your Personal Data

Only HSE staff, agents and suppliers who are directly involved with the management of the Steps to Health website and staff initiatives of Health and Wellbeing shall have access to your personal data which is collected by this website.

All HSE staff, agents and suppliers which may have access to personal data shall be bound to the HSE via confidentiality agreements and are obliged to keep your personal data secure, and to use it only for the purposes specified by the HSE.

Will my personal data be transferred outside of the European Economic Area (EEA)

Currently a UK company is being used to collect and process information about your use of this Staff Health and Wellbeing Initiative.

The HSE does not transfer any other personal data about you outside the EEA. If the HSE decides to transfer your personal data outside the EEA they shall ensure the provisions of Chapter V of the General Data Protection Regulation (GDPR) are complied with.

What are your Rights

Under certain circumstances, by law you have the right to

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing.
- **Right of portability** – where certain conditions apply, you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right to be subject to the legal effects of automated processing or profiling.
- **Right to review:** in the event that the HSE's refuses your request under rights of access, we will provide you with a reason as to why.

If you wish to exercise any of these rights, then please submit a request, to HSE Consumer Affairs at: www.hse.ie/eng/services/yourhealthservice/info/contact/

When submitting a request, the HSE may need information from you to confirm your identity.

Once your identity has been confirmed, the HSE will supply you with your information free of charge, however, we may charge a reasonable fee if believe your request is clearly unfounded, excessive or repetitive.

Making a complaint

In the event that you wish to make a complaint about how your personal data is being processed by the HSE, or how your complaint has been handled, you have the right to lodge a complaint directly with the Data Protection supervisory authority and the HSE Data Protection Officer:

Data Protection Supervisory Authority – (www.dataprivacy.ie)

The **HSE Data Protection Officer (DPO)** can be contacted directly, here:

Joe Ryan

Email: dpo@hse.ie

Phone: 01 635 2726

Address: Dr Steevens Hospital, Steevens Lane, Dublin 8

The Security of your Personal Data

The HSE have legal obligations under the EU General Data Protection Regulations (GDPR) and the Data Protection Acts 1988 – 2018 to ensure all personal data which it collects and processes belonging to its patients, clients, staff and others is kept confidential and secure.

To comply with these legal obligations the HSE have implemented a number of technical and organisational measures to protect the personal data it collects against unauthorised or unlawful processing, accidental loss, destruction or damage.

Secondary Processing of your Personal Data

The HSE will not use the personal data we collect about you from any of our Steps to Health surveys for any other purposes without first contacting you and seeking your consent, or anonymising your data to remove all your personal details making it impossible to identify you.

Cookies & Site Tracking

This website uses cookies to enable the HSE to improve its service to you. Cookies are small text files which are downloaded to your computer device when you visit a website. Your web browser (for example, Internet Explorer, Mozilla, Google Chrome etc) then sends these cookies back to website on each subsequent visit so that they can recognise you and remember things like your preferences. The HSE cookie policy is published on the hse website at: www.hse.ie/eng/cookie-policy/

The HSE also uses tracking software to help use monitor users traffic patterns and site usage to help us develop the design and layout of our websites. The tracking software may collect the following technical information about your use of this website:

- IP address
- The type of computer device used by you to connect to the website
- Operating system of the computer device used by you to connect to the website
- Your preferred language used to display the webpage
- The data and time when you accessed the website
- The page you visited on the website

- Total time you spent on the website
- Geographic location (country only) of the computer device used by you to connect to the website.

Changes to this Privacy Policy

This Privacy Policy may change from time to time and any changes to the Policy will be communicated by of a notice on our website