

REFERENCE GUIDE:

DEPARTMENT OF
EMPLOYMENT AFFAIRS
RESPONSE TO THE OFFICE
OF THE DATA PROTECTION
COMMISSIONER
RE. SAFE REGISTRATION
AND THE PSC



NO. DPC QUESTION



1	What is SAFE 2 registration?	1
2	What Government entities can conduct and do conduct SAFE 2 registration?	13
3	What is the legal basis for SAFE 2 registration?	14
4	What governance mechanisms have been put in place to oversee and underpin the data sharing arrangement? Will these arrangements be made public?	20
5	When SAFE 2 registration data (please specify fields of data) is collected from individuals through government bodies, is that registration data kept on one centralised State register?	22
6	How frequently will an individual be required to update their data for Safe 2? e.g. photograph?	23
7	Who is the data controller for that State register? Please include contact details for the relevant officer, where applicable.	24
8	To whom can I direct a data protection access request under S4 of the Irish Data Protection Acts 1988 and 2003 if I wish to obtain a copy of my SAFE 2 registration data including photograph? In what format will the data be issued to me? Paper or electronically or do I have a choice? In what form is it held by the controller?	25
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11	If I leave Ireland and emigrate permanently, can I request my SAFE 2 registration be cancelled and deleted (ie exercise a Right to be Forgotten)?	28
12	How is the data technically and organisationally secured by the controller?	29

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13	What third parties have access to the data and in what circumstances?	19 & 20
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16	If it is not mandatory, in what circumstances will I not be able to avail of government services and which government services will be denied to me?	4, 5, 16, 17 & 32
17	On what legal basis may those services be denied to me?	14 & 32
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23	What technical requirements were imposed on the service provider in the contract/agreement to safeguard the data?	30
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NO. DPC QUESTION



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NO. DPC QUESTION



47 What is the Government data-sharing Bill? Does it mean all of my personal data will end up shared across government departments? If I do not want this to happen, can I object to the sharing? What about the “purpose limitation” principle of data protection law? How can government departments who told me they were collecting my data for one specific purpose then share it with another government entity for another purpose?

48 Question is relevant to Department of Public Expenditure and Reform

