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## Future Focus 21c - Data Management Policy

Much of FF21c's work is undertaken within a research context, ethical review and therefore adhere's to institutional data management, GDPR and research integrity procedures. This can mean in addition to our own policy there are additional practices set by the institutions we partner with, changing from project to project as required.

Our standard policy is as follows which ensures protection for those we serve, many of whom are vulnerable participants / minors. We align to ethical practices overseen by UCD Ethics department <https://www.ucd.ie/researchethics/informationforresearchers/researchwithvulnerablegroups/> which is also informed by TUSLA policies. <https://www.tusla.ie/research/tusla-research-office/guidance-for-research-participants-under-the-age-of-18/>

## Client Privacy Policy and Data Management Procedures

1. Introduction Our company is committed to protecting the privacy and security of our clients' personal data. This policy outlines our practices regarding data collection, storage, and protection, ensuring compliance with applicable regulations, including GDPR and CCPA.

2. Data Collection We collect personal information solely for the purpose of delivering our services, improving user experience, and ensuring compliance with legal obligations. The types of data collected include:

- Client contact information (name, email, phone number, address).
- Service-related information (purchase history, preferences).
- Website usage data (IP address / anonymous analytics).

3. Data Storage and Protection All personal data is stored securely. Our data storage practices include:

- Access Control: Limited access to authorised personnel only with a named GDPR officer on many projects due to additional institutional requirements.
- Regular Backups: Data is held online on secure servers often within our research partners facilities e.g. UCD or Inova+ to prevent data loss.
- Retention: Data is retained only as long as necessary for the purposes outlined with regular end of project checks and in alignment with our research partnership procedures.

4. Data Management Procedures Our internal procedures ensure the responsible management of client data and are aligned to UCDs GDPR and our ethics review:

CRO: 719236

VAT: 4122197OH



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- **Data Access:** Employees access data strictly on a need-to-know basis and in line with job spec / GDPR requirements e.g. designated officer.
- **Data Review:** Regular audits are conducted to ensure data accuracy and relevance.
- **Deletion Requests:** Clients can request data deletion as per GDPR and CCPA rights as well as at any stage if relating to a research process.

5. **Data Breach Response Plan** In the event of a data breach, the following steps will be taken:

- **Identification:** Immediate detection and investigation of the breach.
- **Containment:** Isolation of affected systems to prevent further exposure.
- **Notification:** Affected clients and relevant authorities will be notified within 72 hours.
- **Remediation:** A comprehensive review and corrective action plan will be implemented.

6. **Compliance and Review:** Our privacy practices are reviewed annually to ensure continued compliance with applicable regulations.

For further details or to exercise your rights under this policy, please contact Dr Anita McKeown, FRSA, FIPM, MEI [anita@futurefocus21c.com](mailto:anita@futurefocus21c.com)



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