

CENTRAL  
APPLICATIONS  
OFFICE

# DATA TRANSPARENCY

**CAO**  
[www.cao.ie](http://www.cao.ie)

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## 1. Introduction

This transparency document is produced for the purposes of ensuring compliance with Data Protection Legislation, amongst others, Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation 2016/679) (mentioned below as 'GDPR'), in particular, Article 12 of the GDPR.

Article 12 of the GDPR, amongst other requirements, requires the CAO to provide transparent information on how we process your data. This document is intended to provide comprehensive information in relation to personal data provided as part of applications to Higher Education Institutions (HEIs) processed by the CAO.

The CAO and any HEI you apply to are considered to be Joint Controllers of the personal data related to the application. The CAO have provided a copy of a sample joint controller agreement on our website for applicants to view. This agreement outlines respective responsibilities of the CAO and HEIs for compliance with the GDPR as required by Article 26.

The personal data of successful applicants to the HEI may be transferred to other systems within the HEI such as a student record system. Please note where you have been successful in securing an offer and subsequently enrol/register at the HEI the information collected by the HEI at the point of enrolment/registration and subsequently are not within the scope of this agreement.

This document outlines what data we request from you, the purpose and legal basis of this request, how long we keep your data, who has access to your data, who we share your data with and why, who shares data with us and why, and outlines how you can exercise your rights under GDPR.

Due to the changing nature of the application process, this document will be regularly reviewed and updated to reflect current practice.

Whilst the CAO has taken reasonable care that this document be complete and accurate for purposes of transparency, it is possible that there are errors and omissions within it and this document should not be relied upon for any aspect of your actual application as you should consult the CAO Handbook and website for full details. In addition, due to the possibility of errors and omissions, this document is not intended to be relied on in relation to the exercise of legal rights against the CAO or HEI.

## 2. Data we request from you

2.1. If you make an application, the data CAO requests from you depends on which section of the application you are completing. There are some sections which you are not required to complete. The following lists all the various sections and data requested in each.

### 2.1.1. The general CAO Application Form

#### *Personal Details*

Name (Title, Name & Surname);  
Correspondence Address (including Eircode);  
Date of Birth, Sex, Country of Birth and your Nationality;  
Contact Telephone Number;  
Email address.

#### *Qualifications (including those that are ongoing)*

School Name(s) and Address(es) (including Country) and years of schools which you attended;  
Previous Leaving Certificate details (if applicable);  
Personal Public Service (PPS) Number (for those applying with QQI qualifications);  
Details of any General Certificate of Education (GCE/GCSE) examination to be taken (Details of GCE/GCSE examination (s) already taken are to be provided by post);  
Details and Brief Description of any other school leaving exams;  
Brief Description of any FETAC examinations prior to 2002;  
Brief Description of any other Higher and Further Education.

You may be required to submit documents in relation to these qualifications, which will be scanned and stored by the CAO.

#### *Course Choices*

A list of up to 10 courses in order of your preference for either/both level 8 and levels 7/6;

#### *Consent information*

Indication of consent to be contacted by CAO via SMS;  
Indication of consent to be contacted by an HEI via SMS;  
Indication of consent to provision of details to Student Universal Support Ireland (SUSI);

### 2.1.2. HEAR Application Form

Home Address (including Eircode);  
Details of any DEIS School attended;  
Your PPS number;  
Details of any Medical Card/GP Card held by your or your parents/guardians (including relevant PPS numbers, names and dates of birth);  
Whether you are in Care of the State and/or TUSLA;  
Whether you are a member of the Traveller and Roma Communities;  
Whether you or your parents/guardians have experienced homelessness (including relevant PPSNs, names, dates of birth);  
Whether you are a young parent;  
Number of family dependants (including relevant names, dates of birth, school/college);  
Employment details, financial circumstances and details of income of parents/guardians including names;  
HEAR eligibility details from previous year.

Indication of consent to the HEAR scheme terms and conditions.

You may be required to submit relevant documentation to support your application, which will be scanned and stored by the CAO.

#### 2.1.3. DARE Application Form and Supplementary Information Form

Details of disability;

Supports received at 2<sup>nd</sup> level and supports required for 3<sup>rd</sup> level;

Personal statement relating to the impact of your disability on your education; Educational Impact Statement;

Evidence of your disability.

Indication of consent to the DARE scheme terms and conditions.

You may be required to submit relevant documentation to support your application, which will be scanned and stored by the CAO.

#### 2.1.4. CAO Application Form - Mature Applicant

Highest Qualification to Date;

Details of Current Studies;

Details of Post-Secondary Education;

Details of Second Level Education;

Details of Other Second Level Exams;

Details of Non-Certificate Courses;

Details of Employment or Voluntary Work;

Details of English Language Proficiency (if applicable);

Details of References;

Statement of Interest;

Hobbies/Interests;

Additional Information you may wish to provide.

#### 2.1.5. Specific course requirements

For a number of courses, specific documentation or examinations may be required to support your application. Where supplied directly to the CAO, this information will be stored securely by the CAO. Please consult the course entry requirements for further details.

## 2.2. If you use our website

### 2.2.1. Email enquiry form

Your Name;

Email address;

CAO Application Number (if applicable, but if provided your enquiry will be linked to your application);

Details of enquiry which you may include personal data within.

#### 2.2.2. Demo Application

Data entered as part of a demo application is not stored on our system.

#### 2.2.3. Interactive Handbook

If you choose to register to save and share your personalised CAO Handbook you will be asked to provide your name and email address.

#### 2.2.4. Detailed Logs

The CAO capture a range of information after you log in to and access your account, this includes changes you make, timings of these changes, your Internet Protocol (IP) address of the device you are using and times of log in and out.

#### 2.2.5. "Cookies"

The CAO website uses "session cookies" within the online application facilities. Session cookies are temporary memory cookies, which are removed from your computer when the session is closed. Session cookies are what many interactive applications, such as our online application facilities, need to track your machine's unique messages while you are using the application.

"Session cookies" need to be accepted by your browser for you to use our online application facilities. This website also uses cookies to record your language preference.

If you use the CAO virtual assistant, you will be asked to consent to "third party cookies". IBM use an anonymous identifier to track the usage of the virtual assistant to allow them to determine the level of service that CAO requires.

If you use the CAO interactive handbook you will be asked to consent to the use of "third-party cookies". Prospectus Plus use identifiers to track the usage of this handbook to allow them to improve the services they offer.

If you use the search bar on the CAO website our service provider (Search Site 360) will use "third-party cookies". Site Search 360 use these anonymous identifiers to allow them to improve the services they offer.

2.2.6. In some cases, clicking on a link may result in redirection to another website. Please review the respective data policies of these websites.

2.3 If you make a phone call to the CAO offices caller ID will capture your phone number. This phone number will solely be used for the purposes of contacting you regarding a CAO query/application.

2.4 If you request additional CAO Handbooks via telephone we will ask for your name and address. This data will be held only as long as is necessary, i.e. your name and address will be deleted when the Handbooks are posted to you.

- 2.5 The CAO office has CCTV surveillance in operation. These images are being monitored for the purpose of public safety, crime and prosecution of offences
- 2.6 Occasionally, CAO may survey users of our services. All surveys seek data anonymously – do not enter any personal or sensitive information into survey forms.
- 2.7 If you wish to attend a CAO conference/event you may need to provide personal information.
- 2.8 If you choose to submit an appeal to the Independent Appeals Commission, any information you include on the appeals form will be used for the purpose of reviewing and responding to your appeal. This data will be held in your Independent Appeals Commission file.

### **3. The purpose and legal basis of data processing**

#### **3.1 CAO Application Form – Personal Data**

This personal data is collected for the purposes of enabling CAO to efficiently process your application for consideration for entry to 3<sup>rd</sup> level education. It also allows us to link your application form with your examination results to facilitate the evaluation of your application by the HEIs and determine whether you will receive an offer of a place on your chosen course.

The legal basis for doing so is the performance of a contract as defined by Article 6.1 (b) of the GDPR.

You may receive notification in relation to your application, by SMS, email and post from CAO and HEIs during the year in which you apply. In certain instances, you will have consented to this notification otherwise it will be required as part of performance of the contract.

#### **3.2 HEAR Application Form – Special Categories Data**

This data is collected to assist in determining your eligibility for the HEAR scheme. The data will be checked against eligibility indicators, which are all outlined in the relevant HEAR handbook. The data will be assessed by fully trained Assessors and Screeners and will be available to the relevant HEI(s) that you have applied to, to allow them to prepare the sufficient supports required. In certain instances, your application may be reviewed by staff in HEIs which you have not applied to as they have speciality knowledge required in a specific indicator. In other instances, it may be required to refer your application to professionals from the Department of Education and Youth, Revenue, the Department of Social Protection, the National PASS (Pathway Accommodation and Support System) Office or MABS (The Money Advice and Budgeting Service) for guidance on assessing your application.

The legal basis for doing so is consent as defined by Article 6.1 (a) of the GDPR.

#### **3.3 DARE Application Form/Supplementary Information Form – Special Categories Data**

The Supplementary Information Form has two purposes: to inform Higher Education Institutions of specific supports you may need in relation to your disability/specific learning difficulty and to allow you to be considered for DARE and other supplementary admissions routes for students with disabilities/specific learning difficulties.

Where this data is collected to assist in determining your eligibility for the DARE scheme. The data will be checked against eligibility indicators, which are all outlined in the relevant DARE handbook. The

data will be assessed by fully trained Assessors and Screeners and will be available to the relevant HEI(s) that you have applied to, to allow them to prepare the sufficient supports required.

In certain instances, your application may be reviewed by staff in HEIs which you have not applied to as they have speciality knowledge in the area of disability that you have applied under. In other instances, it may be required to refer your application to medical and/or educational professionals for guidance on assessing your application.

The legal basis for doing so is consent as defined by Article 6.1 (a) of the GDPR.

### 3.4 CAO Application Form - Mature Applicant Data

This data is collected to allow CAO to process your application on the grounds of mature entry. Your supporting documents will allow the relevant HEIs to evaluate your application to determine whether you will receive a place on mature grounds, in some cases through additional assessment. The legal basis for doing so is the performance of a contract as defined by Article 6.1 (b) of the GDPR.

### 3.5 Specific course requirements

For a number of courses, specific documentation or examinations may be required to support your application. The purpose of this documentation or examination varies from course to course and the HEI can advise the applicant on this requirement. The legal basis for doing so is the performance of a contract as defined by Article 6.1 (b) of the GDPR.

### 3.6 Email enquiry form

The CAO will use this data to answer your query and store to answer future queries more efficiently. The legal basis for this processing is consent.

### 3.7 Personalised Handbook

This data is collected to provide a login for your personalised Handbook. The legal basis for this processing is consent.

### 3.8 Detailed Logs and Cookies

The CAO uses this data to ensure the security of our IT system. The data may also be required to resolve disputes in relation to access and/or changes. The legal basis for this processing is an implied term of the contract with you the applicant.

## 4. Data Retention

### 4.1 Data retention

The CAO has a Data Retention Policy which outlines how documents, including documents with personal data, are retained and protected within the CAO and, when applicable, destroyed by the

CAO. The policy also outlines the rationale behind the periods of time chosen in the document retention schedule.

The Data Retention Policy is available to view on our website – [www.cao.ie](http://www.cao.ie)

## 5. Who has access to your data

- 5.1 CAO employees will have access to password protected current year applicant data and select CAO employees will have access to applicant data records from previous years.
- 5.2 HEIs will have password protected access to select applicant data from the current year, including scanned documents supporting their applications.

## 6. Who we share your data with and why

### 6.1 Quality and Qualifications Ireland (QQI)

The CAO forward to QQI an applicant data file containing applicant name, Date of Birth, and QQI exam number which is normally the Personal Public Service Number (PPSN). A data matching exercise will be completed by QQI, and the outcome returned to CAO and where possible QQI will extract from their database the records associated with the QQI exam number, namely, Name, Date of Birth, centre code, and relevant Further Education results level 4, 5, 6 and transmit these records to CAO.

The QQI database is based outside of the EEA. QQI use specific contracts that are approved by the European Commission for the transfer of personal data to third countries. These contracts require the same levels of personal data protection that would apply under Data Protection Legislation.

### 6.2 Irish University Association (IUA)

Applicant data is shared with the IUA Access Manager to facilitate quality assurance, on behalf of the HEIs, of the CAO administration of the HEAR and DARE schemes. Quality assurance may include the review of individual applications by IUA staff on request of a HEI or CAO. It may also include the organisation and convening of advisory boards to review groups of individual applications under different criteria.

### 6.3 Gamma

HEAR applicant data will be shared with Gamma, a specialist mapping, GIS and demographic analysis consultancy firm, who assess your data to verify the 'Area Profile' indicator from the HEAR application form. The data provided includes your CAO number and Address (including Eircode). Gamma create geo codes based on the address data of HEAR applicants provided by the CAO. Gamma match this geo code against an index to assess whether it is an eligible area or not. The result of this match is returned to the CAO.

#### 6.4 Health Service Executive (HSE)

HEAR applicant data will be shared with the HSE, to verify the 'Medical/GP Card' indicator on the HEAR application form. This data includes your Medical Card or GP Visit Card or that of your parent(s)/guardian(s) if applicable, and your PPSN or that of your parent(s)/guardian(s).

#### 6.5 Department of Education (DOE)

HEAR applicant data will be shared with the DES to verify the 'DEIS School Attendance' indicator from the HEAR application form. This data includes your CAO number, PPSN, Name, Date of Birth, DEIS School Name, Address and Roll Number. A data matching exercise is completed by DES and where a match obtained the following information is returned to the CAO: PPSN, CAO Number, Name, Date of Birth, DEIS Schools in DES databases and indicator of 5 years of attendance or not.

#### 6.6 Department of Education (DOE) or other relevant government department

As part of a CAO application, an applicant may apply to certain primary education courses as a Gaeltacht applicant. To ensure an applicant may be considered for the Gaeltacht entry route, the CAO transfers personal data to the DOE who in return verifies the status of an applicant. This data includes the applicants Eircode.

#### 6.7 Pathway Accommodation and Support System Office

If an applicant has completed section 4.4. Applicants Who Experienced Homelessness, data will be shared with the PASS Office for verification purposes. This data includes relevant PPSNs.

#### 6.8 Elavon

When you make your application to CAO, you will be given an option to pay your fee by debit or credit card. Elavon act as the payment gateway for any chargeback payments relating to your application. Any chargeback requests will require CAO to send personal data to Elavon in order to process the request.

#### 6.9 Global Payments

Global Payments facilitates the CAO application fee payment process. There is an initial transfer to Global Payments of CAO application number and Order ID. For the purpose of processing payments you will be asked to provide card details and cardholder's name. From November 2020 to comply with PSD2, you will also be asked to provide the cardholders email and billing address. This data is held by Global Payments and not retained by CAO. On settlement of the payment the CAO transfers to Global Payments, as a comment, the CAO application number and Name of Applicant. The purpose is to allow the reconciliation of payment records and query handling by CAO where required.

#### 6.10 Confidential Shredding Service

CAO employ a service for the confidential destruction of documents. For example, documents at the end of their document retention period (CAO Data Retention Policy is available of [www.cao.ie](http://www.cao.ie)) or working documents that need to be disposed of confidentially are shredded.

#### 6.11 Scanning Service

As part of your CAO application, you may be required to provide a range of paper documents for assessment in support of your application. In order to ensure the efficient and timely processing of the overall application, an external company provide a document scanning service to the CAO. This service involves the secure transfer of paper documents to the scanning service premises, where the documents are scanned, the resulting scanned images are transferred back to the CAO via a secure server, and the original documents are securely transferred to the CAO shortly afterwards.

#### 6.12 Student Universal Support Ireland (SUSI)

When you make your application to CAO you can choose to have your details sent on to SUSI for determining your eligibility to receive a higher education grant. If you choose this option, the CAO will share your data with SUSI once you accept an offer of a place.

If you make an application for the 1916 Bursary on the SUSI website, you can choose to have your CAO number sent to CAO to indicate that you wish to have CAO share your data with SUSI. If you choose this option, the CAO will share your data with SUSI once you accept an offer of a place. This data will be used by SUSI to assess your application.

#### 6.13 SMS Provider

As part of your CAO application, you can choose to receive communication from the CAO via SMS (short messaging service). If you choose this option, the CAO will transfer your CAO application number and mobile number to the SMS provider who will send an SMS to you on behalf of the CAO when you complete your initial CAO application. The CAO will also transfer to the SMS provider your CAO application number, mobile number and course code of offer if an offer has been made to you. The SMS provider will send an SMS to you on behalf of the CAO informing you of your offer.

#### 6.14 Bulk Mail Provider

As part of your CAO application, you will receive emails from CAO. Please note that CAO may use a trusted bulk mail provider to distribute application-related emails in high volumes.

#### 6.15 Universities and Colleges Admissions Service (UCAS)

*For the purposes of an application to UCAS*

The State Examinations Commission (SEC) have agreed to provide UCAS with the Leaving Certificate results of applicants to UCAS for the purpose of applying for entry to University and/or College in the United Kingdom. The SEC have appointed CAO as the processor for the purpose of transferring these results to UCAS. The results data for current-year Leaving Certificate candidates who apply to UCAS and who have provided express permission to UCAS to access their examination results from the SEC, are transferred by the CAO to UCAS.

*For the purposes of an application to CAO*

The results obtained by a CAO applicant in their General Certificate of Education (GCE) may be required to process the application to a HEI. UCAS transfer GCE results to the CAO for a number of applicants on request. The CAO only request GCE results for CAO applicants who have indicated that they expect to receive these results in the summer of the year of application from examination boards in either Wales or England.

The CAO forward an applicant data file containing applicant Name, Date of Birth, Sex, GCE exam number and CAO number. A data matching exercise will be completed by UCAS and the outcome returned to CAO and where possible UCAS will extract from their database the records associated with the UCAS exam number, namely, Name, Date of Birth, GCE Exam board, and GCE results and transmit these records to CAO.

#### 6.16 Graduate Medicine Application Assessment Procedure.

The HEIs who offer graduate medicine courses have agreed to jointly assess all graduate medicine applications. This is to ensure that a consistent approach is taken to all applications. This does mean, in limited circumstances, that a representative from an HEI that you have not applied to may have temporary access to details of your personal data provided in respect of your graduate medicine application during this joint assessment process.

#### 6.17 EU/EFTA Application Assessment Procedure.

The HEIs have agreed to jointly assess all EU/EFTA applications. This is to ensure that a consistent approach is taken to all applications. This does mean, that a representative from a HEI that you have not applied to may have temporary access to details of your personal data provided in respect of your application during this joint assessment process.

#### 6.18 Research Purposes

The CAO may provide anonymised data to *bone-fide* researchers in participating Higher Education Institutions (HEIs) or other recognised bodies/organisations.

This will not contain data which is personally identifiable to you and the researcher will be required to agree that they will not attempt to identify you from this data. In instances where a researcher has your consent to participate in the research, CAO may provide the researcher with a copy of your data which is not anonymised.

#### 6.19 Verification Purposes

Any document presented by an applicant in support of an application may be disclosed (by CAO or a Higher Education Institution) to the person/body that issued the document for verification purposes.

### 7. Data that is shared with us by whom and why, and the legal basis for sharing

#### 7.1 State Examinations Commission (SEC)/Executive Office of Calculated Grades (EOCG)

A CAO applicant's Leaving Certificate results may be required by the CAO to process the application to the HEI and therefore is part of the CAO contract with an applicant.

#### 7.2 Quality and Qualifications Ireland (QQI)

A CAO applicant's QQI awards may be required by the CAO to process the application to the HEI and therefore is part of the CAO contract with an applicant.

#### 7.3 Assessment Service provided by NMBI (Nursing and Midwifery Board Ireland)

An assessment service is provided by NMBI to administer the Mature Nursing Examination on behalf of various HEIs. The result obtained by a CAO applicant in the Mature Nursing Examination is required to process the application to a place on a nursing course on a mature basis and therefore is part of the CAO contract with an applicant.

#### 7.4 Universities and Colleges Admissions Service (UCAS)

The results obtained by a CAO applicant in their General Certificate of Education (GCE) may be required to process the application to the Higher Education Institution and therefore is part of the CAO contract with data subjects. UCAS transfer GCE results to the CAO for a number of applicants on request. The CAO only request GCE results for CAO applicants who have indicated that they have these results from examination boards in either Wales or England. UCAS also shared the results for Cambridge Pre U examinations if available for this group of applicants.

#### 7.5 Council for the Curriculum, Examinations and Assessment (CCEA)

The results obtained by a CAO applicant in their General Certificate of Education (GCE) may be required to process the application to the Higher Education Institution and therefore is part of the CAO contract with data subjects. CCEA transfers GCE results for all candidates in Northern Ireland. Non-CAO applicants' results are also transferred and the presumed legal basis for this transfer is the public interest.

#### 7.6 Australian Council for Educational Research (ACER)

ACER administer a range of assessments on behalf of the Higher Education Institutions, these assessments include the following; Health Professions Admission Test (HPAT) and Graduate Medical School Admissions Test (GAMSAT).

The results obtained by a CAO applicant in these assessments may be required to process the application to certain courses within the Higher Education Institutions and therefore is part of the CAO contract with data subjects. ACER transfers results of these assessments for all candidates in Ireland.

#### 7.7 International Baccalaureate Organisation (IBO)

The results obtained by a CAO applicant in their International Baccalaureate (IB) may be required to process the application to the Higher Education Institution and therefore is part of the CAO contract with data subjects. The CAO download results from a secure IBO website for a number of applicants. The CAO only download details for CAO applicants who have authorised the CAO to receive their results.

#### 7.8 National University of Ireland

The exemptions from entry requirements obtained by a CAO applicant may be required to process the application to certain HEIs and therefore is part of the CAO contract with data subjects. The NUI transfers the exemptions of CAO applicants of those who have indicated to NUI that they have a current year CAO application.

## 8. Your personal data rights

### 8.1 Right to access your personal data

You can contact the CAO to request a copy of your personal data that is held on our system, as outlined in Article 15 of the GDPR. You will be directed to make your request via the online request form. CAO will provide you with an electronic PDF copy of your personal data from our files within 30 days of receiving your written request.

### 8.2 Withdrawal of Consent

The legal basis for processing your overall application is a contract with the CAO, therefore, it is not possible to withdraw consent for the overall application, however, you may withdraw consent for the processing of your personal data in relation to the three access schemes administered by the CAO, which are, the Higher Education Access Route (HEAR), the Disability Access Route to Education (DARE) and the Trinity Feasibility Study scheme.

You can request the CAO to withdraw your consent to allow the CAO to process your personal information for these schemes via the CAO website.

As a withdrawal of consent may be irreversible and may have a significant detrimental effect as you may not be offered a place in an HEI which you would otherwise have been offered, the CAO requires you firstly to indicate your request via your application and secondly by signing and returning to the CAO a “Withdrawal of Consent” request form.

### 8.3 Right to have your personal data rectified

You may request, through the CAO website, the rectification of any inaccurate personal data held by CAO under Article 16 of the GDPR. Where the personal data is provided by you and not being directly used for assessment of your application the CAO will correct any inaccurate data and make available to the HEI.

Where the personal data is provided by you and is being directly used for assessment of your application, it may not be possible to take account of amendments to data for assessment purposes if provided after a deadline for submission of the data; this is to ensure that the application process for all applicants is run in an efficient and fair manner.

### 8.4 Right to have your personal data deleted

You may request the erasure of personal data, held by CAO, under Article 17 of the GDPR. If this request is made prior to any offers being made, the CAO will delete the data and inform the HEI of the request who will delete any data on their system.

As deletion of an application is irreversible and may have a significant detrimental effect as you will not be offered a place in an HEI, the CAO requires you firstly to indicate your request via your

application and secondly by signing and returning to the CAO a “Deletion of Personal Data” request form.

If you make the request after you have been made an offer, this data will not be deleted as it is required in the public interest to record potential college acceptances for the purposes of the administration by higher educational institutions of the free fees scheme.

If you request erasure after any offers have been made and you have not been made an offer, a request for erasure will initially result in pseudonymisation of the personal data as it will be required to ensure validity of other offers which have been made to others. This data will be erased after all offers have been made.

## 8.5 Other Rights

Under the GDPR you have a range of rights, the most common of which are outlined above, where you wish to exercise another right please contact the DPO directly.