



SECTION 01

Privacy & Data Protection Notice

How FÁS NeuroLearning collects, uses, stores and protects personal data.

At a glance

FÁS NeuroLearning uses personal data only where it is needed to respond to enquiries, enrol children, deliver and review educational programmes, keep children safe, communicate with families, manage payments and meet legal or regulatory obligations. We do not sell personal data and we do not use automated decision-making or profiling.

Who is responsible for your data?

FÁS NeuroLearning is the data controller for the personal data described in this notice. FÁS NeuroLearning is a registered business name operated as a sole trader in Ireland.

Data protection contact: fasneurolearning@gmail.com | 083 093 1270

Who this notice applies to

This notice applies to children who attend or are being considered for FÁS NeuroLearning programmes, their parents or legal guardians, emergency contacts, and people who contact FÁS NeuroLearning about its services. It covers enquiries, consultations, enrolment, programme participation, learning and progress records, communications, photographs or videos where permission is given, and payment records.

What personal data may we collect?

Category	Examples
Child details	Name, preferred name, date of birth, pronouns, main language, interests, strengths and information relevant to participation.
Parent / guardian details	Name, relationship to the child, telephone number, email address, communication preferences and relevant family/contact restrictions.
Emergency & collection	Emergency contact details, usual collector information and any independent-departure authorisation.
Health & safety	Allergies, asthma, anaphylaxis, sensory or mobility needs, emergency medication information and other relevant safety information.
Programme records	Learning Profile Observation notes, baseline information, Individual Learning Plans, attendance, session notes, progress trackers, internal reviews and quarterly reports.
Reports supplied by families	Relevant school, educational psychology, speech and language, occupational therapy or other specialist reports that a family chooses to provide.
Communications & payments	Relevant email/WhatsApp communications, payer name, payment date, amount and transaction reference.
Images / video	Photographs or short video clips only where the relevant permission has been given.

Why We Use Personal Data

The purpose and lawful basis depend on the type of information and why it is needed.

Purpose	Why / legal basis
Enquiries & consultation	To respond to families, arrange consultations and assess whether FÁS NeuroLearning may be suitable. Lawful basis: steps taken at the request of the parent/guardian before entering a service agreement and, where appropriate, legitimate interests.
Enrolment & programme delivery	To organise groups, provide the agreed educational programme, maintain attendance and deliver personalised educational support. Lawful basis: performance of the service agreement with the parent/legal guardian.
Learning & progress records	To plan, adapt and review the child's programme and provide progress information to the family. Lawful basis: performance of the service agreement and legitimate interests in providing a safe, organised and effective educational service.
Health / special-category data	To support safe participation and respond appropriately to health or safety needs. Health information is special-category data. Where required, FÁS NeuroLearning relies on explicit consent; another lawful basis may apply in a genuine emergency or where data is necessary for legal claims.
Professional reports	To use relevant information voluntarily provided by families to inform educational planning. Where reports contain health or other special-category data, explicit consent will be requested where required.
Payments & accounting	To administer fees, reconcile payments, maintain accounts and comply with tax/legal obligations. Lawful basis: performance of the service agreement and legal obligation.
WhatsApp	To use WhatsApp as an optional communication channel where the parent/legal guardian has agreed to it. Lawful basis: consent.
Internal photographs	To document activities or progress internally where permission has been given. Lawful basis: consent.
Website / social media images	To use a child's photograph or short video in promotional material only where specific permission has been given. Lawful basis: consent.
Incidents, safeguarding & legal matters	To manage accidents, incidents, safeguarding concerns, complaints, insurance matters or legal claims. The lawful basis depends on the circumstances and may include legal obligation, legitimate interests, vital interests or legal claims.

Optional consent

Consent for WhatsApp, photographs, videos and other optional uses can be refused without losing a programme place. Where processing genuinely depends on consent, consent can be withdrawn for future use at any time by contacting FÁS NeuroLearning.

If important information is not provided

Some information is necessary to enrol a child, communicate with the family and provide the programme safely. If essential information is not provided, FÁS NeuroLearning may be unable to offer or continue a place. Optional permissions are different and can be declined.

Sharing, Security & Retention

We aim to use the minimum personal data needed and keep it only for as long as necessary.

Who may receive personal data?

- Authorised FÁS NeuroLearning staff or contractors who need the information to perform their role.
- Service providers used for email, cloud storage, messaging, bookkeeping/accounting, payment administration, IT or security, where appropriate.
- Professional advisers such as an accountant, insurer or legal adviser where necessary.
- Tusla, An Garda Síochána, emergency services, courts, Revenue or another statutory body where disclosure is required or permitted by law or is necessary to protect a child or another person.
- A school or other professional only where the family has specifically requested or authorised this, or where disclosure is otherwise required by law.

FÁS NeuroLearning does not sell personal data to third parties.

Emergency contacts

Emergency contact details are normally provided by the parent/legal guardian rather than directly by the emergency contact. Parents/legal guardians should make sure the person knows that their name and contact details have been provided to FÁS NeuroLearning for emergency purposes.

Service providers and international transfers

Some technology providers may process information outside the European Economic Area. Where this occurs, FÁS NeuroLearning will use providers that rely on a lawful transfer mechanism and appropriate safeguards where required. Optional WhatsApp communications may also be subject to WhatsApp/Meta's own privacy terms.

How we protect information

- Access is limited to people who need the information for FÁS NeuroLearning work.
- Electronic records are kept using password-protected devices/accounts and reasonable security controls.
- Paper records, where used, are kept securely and are not left accessible to unauthorised people.
- Sensitive information is not collected or retained where it is not necessary for the programme.
- Where a personal data breach creates a legal duty to notify the Data Protection Commission and/or affected individuals, FÁS NeuroLearning will follow the applicable GDPR requirements.

How long do we keep data?

Record type	Typical retention
Enquiries not leading to enrolment	Normally up to 12 months after the last meaningful contact, unless a shorter or longer period is justified.
Programme, learning & progress	Normally for the programme and up to 2 years after the child leaves, unless longer retention is needed for a complaint, safeguarding, insurance or legal matter.
Health, emergency & collection	Kept while the child is enrolled and normally deleted within 12 months after leaving unless linked to an incident or another matter requiring longer retention.
Professional reports	Normally retained with the programme record for up to 2 years after the child leaves, unless deletion is requested earlier and there is no legal reason to retain them.
Financial / tax records	Kept for the period required by Irish tax law - generally six years.
Internal photographs	Kept only for the purpose for which permission was given and normally no later than 12 months after the child leaves.
Website / social media images	Kept only while consent remains valid and the material remains useful. Material is reviewed periodically and removed from channels FÁS controls following withdrawal of consent where reasonably possible.
Incident / safeguarding / legal	Retained for as long as necessary to meet safeguarding, insurance, legal or regulatory requirements.

Your Rights & How to Contact Us

Children have data protection rights in their own right, and families can contact us about how information is used.

Data protection rights

Subject to the GDPR and any applicable restrictions, a person may have the right to:

- be informed about how personal data is used;
- request access to personal data;
- ask for inaccurate or incomplete information to be corrected;
- ask for personal data to be erased in certain circumstances;
- ask for processing to be restricted in certain circumstances;
- receive certain personal data in a portable format where the right applies;
- object to processing based on legitimate interests; and
- withdraw consent at any time where consent is the lawful basis.

Not every right applies in every situation. FÁS NeuroLearning may need to verify identity before releasing personal data.

Children's data

The data belongs to the child

A child's personal data remains the child's personal data. A parent or legal guardian may exercise a child's data protection rights on the child's behalf where appropriate and in the child's best interests. Depending on the child's age, understanding and circumstances, an older child may also be able to exercise rights directly.

FÁS NeuroLearning aims to explain privacy and use of information in clear language appropriate to the child where this is relevant.

Photographs and social media

If consent for public photographs or videos is withdrawn, FÁS NeuroLearning will stop future use and will remove the material from channels it controls where reasonably possible. Once material has been made public, FÁS NeuroLearning cannot guarantee that third parties have not copied, shared or stored it.

Automated decision-making

FÁS NeuroLearning does not use automated decision-making or profiling to decide whether a child receives a place or how a child's programme is designed.

Contact FÁS NeuroLearning

Email: fasneurolearning@gmail.com | Phone: 083 093 1270 Please put 'Data Protection' in the email subject line where possible. Valid rights requests will be handled within the time limits required by data protection law.

Right to complain

If you have a concern about how FÁS NeuroLearning has handled personal data, please contact us first so that we can try to resolve it. You also have the right to raise a concern with the Data Protection Commission (DPC), Ireland's data protection supervisory authority.

Data Protection Commission, 6 Pembroke Row, Dublin 2, D02 X963, Ireland.

Changes to this notice

This notice may be updated where FÁS NeuroLearning changes how it uses personal data or where legal or regulatory requirements change. The current version will show its effective date.

Document version

Version 1.1 | Effective: August 2026 | Includes website analytics and cookie information.

Website Analytics & Cookie Choices

How optional Google Analytics measurement works on the FÁS NeuroLearning website.

When analytics is used

FÁS NeuroLearning uses Google Analytics 4 to understand how many people visit the website, which pages are viewed and how the website performs. Google Analytics is optional. The Google tag does not load and no analytics data is sent to Google unless the visitor selects **Accept analytics** in the website banner.

The lawful basis for storing or accessing analytics information on a visitor's device, and for any related processing of personal data, is the visitor's consent. Refusing analytics does not affect access to the website or FÁS NeuroLearning services.

Information Google Analytics may collect

- pages viewed, referral information and basic interaction events;
- session statistics and a pseudonymous browser identifier;
- browser, device, operating-system and language information; and
- approximate location derived from the IP address. Google states that GA4 discards IP addresses before logging them.

FÁS NeuroLearning does not intentionally send enquiry-form content, names, email addresses or information about a child's learning or health needs to Google Analytics.

Cookies and local storage

Name	Purpose	Typical duration
fasAnalyticsConsent (local storage)	Remembers whether analytics was accepted or refused.	Up to 6 months
_ga	Distinguishes pseudonymous visitors after consent.	Up to 6 months
_ga_YQKTVDZ144	Maintains Google Analytics session state after consent.	Up to 6 months

Provider, transfers and retention

Google provides the Analytics service and may process analytics information outside the European Economic Area using the safeguards described in its terms and data-processing arrangements. User-level and event-level Analytics data is normally kept for no longer than 14 months, depending on the property setting; aggregated reports may remain available for longer.

How to change your choice

Use the **Cookie settings** link in the footer at any time. Choosing **Only necessary** stops future Analytics loading and removes accessible GA4 cookies from this website. Consent is requested again after six months. You may also clear cookies and local storage in your browser.