

# **PRIVACY NOTICE**

## **Who We Are**

**Senior Citizens Concern CLG** (*“the Company, we, us”*) gathers and processes your personal information in accordance with this privacy notice and in compliance with the relevant data protection laws. This notice provides you with the necessary information you need regarding your rights and our obligations, and explains how, why and when we process your personal data.

The Company’s main office is at St Louis Day Care Centre, Ramsgrange, Co. Wexford and we are a charity for the provision of services to older people and their families. We are registered with the Charities Regulator under registration number CHY 7812. Our designated Compliance Officer / Appointed Person for the organisation is our Centre Manager, Laura Rowe, who can be contacted at 051 389 509.

## **Information That We Collect**

We may process your personal information to meet our legal, statutory and contractual obligations and to provide you or a family member with services.

We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

We collect personal data from you which you volunteer when you provide such personal data to us, or via our services with which you interact. We may also be given other personal data relating to you by other persons, or we may obtain such other personal data about you as may be provided to us in the course of our legitimate business activities.

We may collect and process Data. Including the following in the course of providing services to you, which could contain your personal data:

1. your full name;
2. your address;
3. your various email addresses;
4. your various phone numbers including mobile phone numbers;
5. your nationality;
6. your address;
7. financial information about you, including your bank account details, credit card details, or other payment details;
8. details of contracts you have entered with third parties for us to provide services to you;
9. details of your relationship to other parties;
10. details of your membership of professional or other organisations;
11. your date of birth;
12. details of your children and other relations;

13. medical details, including details of allergies; and
14. all other Data which you ask us to process on your behalf, or which is necessary for us to process in order for us to fulfil our role in providing the Services to you.

We may also process other data, which is not personal data.

When you access our website or wi-fi facilities, your device's browser provides us with information such as your IP address, browser type, access time and referring URL which is collected and used to compile statistical data. This information may be used to help us to improve our website and the services we offer, and to offer services to you.

***We collect information in the below ways: -***

As part of our administrative function we collect your details so that we can stay in contact with you and ensure that we are providing you with the services you need and are interested in. In many cases we provide transport to and from the Centre and this requires that we collect some information about you. We also provide various services to you in the Centre including hot meals, nursing, hairdressing amongst other things. Clearly in certain circumstances we will need to collect and hold some information about you to facilitate this. We do not pass your special category sensitive information to anyone without your absolute explicit consent unless in the case of an emergency.

**How We Use Your Personal Data (Legal Basis for Processing)**

We take your privacy very seriously and will never disclose or share your data without your explicit consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us communicating with you about our services, you are free to withdraw this consent at any time.

We use your personal data that we hold to:

- In our legitimate interest of promoting our services, provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes (our list of services below);
- carry out our obligations arising from any contracts entered into between you and us;
- comply with legislation; and/or
- notify you about changes to our services.

**Security and where we store your personal data**

We are committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorised access and use.

As effective as modern security practices are, no physical or electronic security system is entirely secure. We cannot guarantee the complete security of our databases, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. We will

continue to revise policies and implement additional security features as new technologies become available.

The transmission of information via the internet is not completely secure and may involve the transfer of data to countries outside of the European Economic Area (EEA). This occurs typically through use of cloud solutions for web hosting, email hosting or proprietary software solutions delivered to us through the Cloud. We do not however authorise any third party to use your personal data for their own purposes. Non-EEA countries may not provide an adequate level of protection in relation to processing your personal data. By submitting your data, you agree to this transfer, storing and processing.

Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to us. Any transmission of data is at your own risk. Once we receive your personal data, we use appropriate security measures to seek to prevent unauthorised access.

### **Disclosure of your information**

We may disclose your Data to third parties who provide a service to us or in the event that we sell or buy any business or assets, in which case we may disclose your Data to the prospective seller or buyer of such business or assets or if we are under a duty to disclose or share your Data in order to comply with any legal obligation, or to protect our rights, property, or safety of staff or customers.

*The purposes and reasons for processing your personal data are detailed below: -*

- We collect your personal data in the performance of and provision of our service to you and to ensure that we are providing you with relevant, high quality and cost effective experiences.
- We collect and store your personal data as part of our legal obligation for business accounting and tax purposes
- We will occasionally send you information about upcoming events and services where we have assessed that it is beneficial to you as a service user and in our interests to do so. Such information will be non-intrusive and is processed on the grounds of legitimate interests.

### **Your Rights**

As an individual, under EU law you have certain rights to apply to us to provide information or make amendments to how we process data relating to you. These rights apply in certain circumstances and are set out below: -

1. The right to access data relating to you ('access right').
2. the right to rectify/correct data relating to you ('right to rectification').

3. The right to object to processing of data relating to you ('right to object').
4. The right to restrict the processing of data relating to you ('right to restriction').
5. The right to erase/delete data relating to you (i.e. the "right to erasure"); and
6. The right to 'port' certain data relating to you from one organisation to another ('right to data portability').

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to correct it as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing from us; to exercise your data portability rights, and to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

### **Sharing and Disclosing Your Personal Information**

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. We engage with and use some third-parties to provide important services to you as well as for our own business functions. However, all third-parties ("Processors") acting on our behalf only process your data in accordance with instructions from us and comply fully with this Privacy Notice, data protection laws and any other appropriate confidentiality and security measures.

### ***Pobal***

Pobal are a government agency who provide us with funding and audit and assess our service delivery and corporate governance. As an employee, in order to secure and maintain funding for your role we are obliged to provide Pobal with information specific to you and your work responsibilities and records.

### ***HSE and other Health Service Providers***

We rely on a number of health service providers to provide essential health and medical services to our Clients. In order to facilitate the provision of vital services we may provide your information to such service providers, this may include sensitive personal information. Before we do provide such information to a third party of this type we will ensure that we have your explicit consent to do so except in cases of emergency where it is in your vital interests to do so. Third party medical service

provider include the HSE, Dr. Kevin Byrne, MS Ireland, Una Goan, Wexford Community Care, Martin Zinck and Babs Zinck (Chiropodist), Patrice MacDonald (Counsellor).

### ***Shiel Kinnear Accounts***

Our accountants do our bookkeeping and tax returns and they act in the capacity of a Data Processor on our behalf. The only information we may provide them with is your name, address and payment details to meet business and legal requirements.

### ***Hairdresser***

We provide various ancillary services including for example hairdressing. Annette Barron currently provides hairdressing services to Clients at the Day Care Centre and information may be provided to her on behalf of a Client to facilitate this. We will ensure that prior to providing any third party service provider of this type with any data we will achieve a Client's consent prior to doing so.

### ***Chiropodist***

Our Clients can avail of the services of a chiropodist on site on occasion and this service is currently provided for us by Martin Zinck and Babs Zinck. We may take appointments on occasion on behalf of Martin and Babs and our Clients and it will be necessary to pass some information to the Chiropodist on your behalf and for the Chiropodist to hold some information about you in order to provide you with their services.

### **Safeguarding Measures**

We take your privacy seriously and take every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place. Full details of our security measures are set out in our IT Security Policy which is available on request from our Centre Manager.

### **Consequences of Not Providing Your Data**

You are not obligated to provide your personal information to us, however, as this information is required for us to provide you with our services, we will not be able to offer some/all our services without it.

### **How Long We Keep Your Data**

We only ever retain personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under Irish tax law to keep your basic personal data (*name, address, contact details*) for a minimum of 6 years after which time it will

be destroyed. For full details of how long we hold your information, please see our Data Retention and Erasure Policy.

### **Special Categories Data**

Owing to the services that we offer, we sometimes need to process sensitive personal information (*known as special category data*) about Clients or their families, to ensure that we are providing a safe and appropriate service or in the event of a medical emergency. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

Where we rely on your consent for processing special category data, we will obtain your explicit consent through a consent form. You can modify or withdraw consent at any time, which we will act on immediately, unless there is a legitimate or legal reason for not doing so.

### **Lodging A Complaint**

We only process your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are dissatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

### **Website**

Our website may, from time to time, contain links to and from other websites. If you follow a link to any of those websites, please note that those websites have their own privacy policies and that we do not accept any responsibility or liability for those policies. Please check those policies before you submit any data to those websites.

### **The Data Controller for the purposes of GDPR is**

Senior Citizens Concern CLG

### **Changes to this policy**

We reserve the right to change this Policy from time to time in our sole discretion. If we make any changes, we will post those changes here so that you can see what information we gather, how we might use that information and in what circumstances we may disclose it. By continuing to use our site or our services or otherwise provide data after we post any such changes, you accept and agree to this Policy as modified.

### **Contact Us**

Questions, comments, requests and complaints regarding this Policy and the information we hold are welcome and should be addressed to the Centre Manager, Laura Rowe at St. Louis Day Care Centre, Ramsgrange, Co. Wexford. All requests will be dealt with promptly and efficiently.

If you wish to do so please contact one of the following;

**Laura Rowe, Centre Manager**

**Ann O'Hanlon, Director and Company Secretary**

Or alternatively the Office of the Data Protection Commissioner. Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23, Ireland.