

CORK DEAF ASSOCIATION
GENERAL SERVICE USER PRIVACY STATEMENT

In accordance with the General Data Protection Regulation (GDPR), we have created this privacy statement to inform you, our service users, of the types of data we process about you. We also include within this statement:

- the reasons for processing your data
- the lawful basis for processing data
- information on data retention
- your rights regarding your data.

This statement applies to Cork Deaf Association general service users.

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, obvious, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be corrected or deleted without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a secure way to protect against unauthorised or unlawful processing, accidental loss, destruction or damage.

B) TYPES OF DATA HELD

We keep several categories of personal data on our service users. We keep this data within our computer systems and within service user files where necessary. Specifically, we hold the following types of data, as appropriate:

- a) personal details such as name, address, phone numbers
- b) name and contact details of your next of kin
- c) your gender, marital status, information of any disability you have or other medical information
- d) PPS Numbers
- e) Any other personal information which is necessary for us to have in order to provide you with the service you require.

C) COLLECTING YOUR DATA

You provide several pieces of data to us directly when you register with us as a service user. In some cases, a third party will refer you to us. We will request any third parties for proof that you have consented to the sharing of their information. Personal data is kept in service user files and within the Cork Deaf Association's IT systems.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. The Cork Deaf Association has a broad range of services and supports. However, information we get from you for one purpose may not be accessed or used for another purpose within the organisation. For example, if you give us your information just so that we may provide you with a service, we will not contact you about fundraising unless you have told us that we may. We will only process your information if it fulfils one of the following lawful purposes:

- You have given your consent for us to process your information for a particular purpose
- the data processing is necessary for the performance of a contract
- the data processing is necessary for legal reasons
- the processing is necessary to protect your vital interests or the vital interests of another person
- the processing is necessary in the public interest or we have official authority to use the personal data
- Using the data is necessary for the purpose of our legitimate interests (so that we can do our job), except when this might interfere with the individuals' rights, especially when the individual is a child.

When we receive your information, we will tell you under what lawful process we will be handling and storing your information. We will give you a registration form stating the lawful purpose under which we intend to collect and hold your information. If you are unsure about why we are holding personal information about you, please contact the Cork Deaf Association Manager (details below).

E) SPECIAL CATEGORIES OF DATA

Special categories of data are data relating to your:

- a) health
- b) sex life
- c) sexual orientation
- d) race
- e) ethnic origin
- f) political opinion
- g) religion
- h) trade union membership
- i) genetic and biometric data.

We carry out processing activities using special category data only if necessary and only if it complies with one of the lawful purposes outlined above. In Cork Deaf Association, we usually handle special categories of data when one of the following is true:

- it is necessary to provide you with our supports and services (legitimate interests)
- you have given your consent
- it is necessary for the performance of a contract
- we are legally obliged to do so
- it is necessary to protect your vital interests or the vital interests of another person
- you have already made the information public

F) CRIMINAL CONVICTIONS AND OFFENCES

We will only collect criminal conviction data if it is appropriate to the nature of the support work we are offering you. We process this information on the basis of legitimate interest.

G) FAILURE TO PROVIDE DATA

If you do not give us data, it may mean that we cannot provide you with a service.

H) WHO WE SHARE YOUR DATA WITH

From time to time we may need to share your data with a third party, depending on the nature of the service we are providing specifically for you. We share your information with a third party if you:

- a) have given your consent
- b) we are legally obliged to do so
- c) to protect your vital interests or the vital interests of another individual.
- d) it is necessary for us to provide you with our supports and services (legitimate interests)

Your data is also processed by IT systems. This is necessary in order for us to maintain an efficient service and to do our job.

Please note that we do hire an external IT company to manage our IT systems and we use a cloud based IT system. The IT details are as follows:

- a) General IT support (Compunet)
- b) Email system and online documents (Outlook 365)
- c) Website development and maintenance (Jamjo)
- d) Email subscriber management (mailchimp)
- e) Confidential document destruction (Rehab Recycling)

We do not share your data with bodies outside of the European Economic Area.

As each service user has unique service requirements, please contact the Manager using the details below if you have any queries on what third parties your information is shared with.

I) PROTECTING YOUR DATA

We know that we have to make sure your data is kept safe and protected against being accidentally lost, seen by people who shouldn't see it, destroyed or not used in the right way. We have put measures in place to protect against any of these things.

J) RETENTION PERIODS (How long we keep data)

Our policy is to keep your information only as long as is necessary and for only as long as it adheres to one of the above mentioned lawful purposes. Our range of services is diverse and retention periods vary, according to the services required by the individual. Please see the *Cork Deaf Association Retention Policy* for a full list of retention periods. A copy of this may

viewed on our website or requested from the Manager, using the details below. When information is no longer required, it will be confidentially destroyed and removed from our IT systems.

K) AUTOMATED DECISION MAKING

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

L) DATA SUBJECT RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. (More information on this can be found in our separate policy on *Subject Access Requests* available on our website or through the Manager);
- c) the right for any wrong data we hold on you to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

M) CONSENT

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time.

N) MAKING A COMPLAINT

You can view our *Data Breach Policy* on our website or by request through the Manager (details below).

If you think your data rights have been breached, you are able to raise a complaint with:

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

Phone +353 (0761) 104 800 | LoCall 1890 25 22 31

Fax +353 57 868 4757 Email info@dataprotection.ie

O) DATA PROTECTION COMPLIANCE

The CDA Manager is responsible for data protection compliance.

Name: Gerrie O' Grady

Phone: (021) 4505944

Email: gerrie@corkdeaf.ie

For further information on data protection policies and forms, see our section on Data Protection on our website

www.corkdeaf.ie