

Cork Deaf Association Privacy Notice

In accordance with Data Protection and Privacy law

V3

1 The Cork Deaf Association as a data controller

The Cork Deaf Association (CDA) is a registered charity delivering support and services to empower Deaf and Hard of Hearing people and those who use cochlear implants or similar assistive technology or who have a hearing related condition, such as tinnitus and their families.

We are committed to the privacy of those that we are involved with. This Privacy Notice gives information about how we handle personal information.

- Controller name; **Cork Deaf Association**
- Controller contact: if you would like to contact the CDA's data protection representative regarding this policy please email us at privacy@corkdeaf.ie, call (021) 4505944 or text (086) 853 5574.

When we handle personal information, we follow the rules of Data Protection Regulation in Ireland and GDPR.

Please ask us for an up to date Privacy Notice if you are thinking about your privacy rights. If you are under 18 please read this Privacy Notice with the assistance of a parent or guardian.

2 Key Definitions

Our or we or CDA refers to the Cork Deaf Association

You, Your, Service user or Subject refers to the person whose personal data is the subject of the text.

Personal Data Information that relates to a person who can be directly or indirectly identified from that information, for example, a person's name, identification number, location, online identifier.

Data Subject A person whose personal information is handled by CDA

Special (often referred to as sensitive) data Data which relates to an individual's health, sex life, sexual orientation, race, ethnic origin, political opinion, religion, and trade union membership. It also includes genetic and biometric data (where used for ID purposes) and data relating to criminal convictions.

Controller The natural or legal person, or body which, alone or jointly decides the purpose and ways that personal data is processed.

3 Purpose and lawful basis

The CDA handles your personal data for many reasons. We must tell you why we are handling your personal information and what legal basis we have for handling your information.

In general, we may get personal information from you which includes name, address, phone numbers, e-mail address and details relating to Deafness or hearing related matters. We may also get similar information from when you sign up to or attend events, subscribe to our newsletter or link in with us in another way.

We may be handling your personal information for many different types of legal basis, for example:

Category	Purpose	Examples of the type of data processed	Legal basis for processing*
<p>*Note: 'Legitimate interest' is one legal basis for handling personal information. The 'legitimate interest' of CDA is the operation of a service to support and empower Deaf and Hard of Hearing people and those who use cochlear implants or similar assistive technology or who have a hearing related condition, such as tinnitus and their families. 'Legitimate interest' also includes raising awareness and providing related education, information and training to the general public.</p>			
Delivery of services to support CDA service users			
Delivery of CDA services	To deliver support services to Deaf and Hard of Hearing people and those who use cochlear implants or similar assistive technology or who have a hearing related condition, such as tinnitus and their families.	1. General Personal Details; name, contact details, date of birth, next of kin. 2. Medical details, family and educational information, legal information, entitlements, PPSN, employment information, medical card details, financial information; other details required to provide CDA services.	- The legitimate Interest of the CDA*, or - Entering into or performance of a contract, or - There is a legal obligation, or - Consent
Provision of training	To provide Irish Sign Language and Deaf Awareness education and training.	Name, contact details, age category, financial records, details relating to any requests for reasonable accommodations.	- The legitimate Interest of the CDA*, or - Entering into or performance of a contract, or - There is a legal obligation, or - Consent
Suppliers of service	To contract or engage with third parties for the delivery of operational or clinical services	Name, address, qualification, contact details	- The legitimate Interest of the CDA*, or - Entering into or performance of a contract, or - Consent
Fund raising			
Eg. Direct marketing, information on volunteer fundraisers, fundraising supporters	To raise awareness and funds for the operation of the CDA	Contact details including postal address, e-mail, phone, mobile phone. (You may opt out of any of the above upon request)	- Consent - Legitimate interest of the CDA*
Voice Recording			
Voice Mail	To record a message for a person or organisation	Voice message	- Consent - Legitimate interest of the CDA*
General Legal/regulatory obligations			
Employment	To manage the employment of staff	Name, address, financial details, qualifications, employment records, bank account, garda vetting information, staff supervision/ management files.	- Contract - There is a legal / regulatory obligation - Vital interest of the subject - Legitimate interest of the CDA*
Volunteers	To manage/facilitate the activities of volunteers in their specific CDA role	Name, address, qualifications, volunteer records, garda vetting information, information required for board membership and activity	- Contract - There is a legal / regulatory obligation - Vital interest of the subject - Legitimate interest of the CDA*
Revenue	To comply with the requirements of Revenue,	Identity, PP number, dividend or interest	- There is a legal / regulatory obligation

	to pay all applicable taxes, enable tax audits and provide tax reports	payments, tax residency, details relating to tax rules and income	
Regulatory Authorities	To enable processes that are compliant with law and regulation, and to facilitate audits and compliance reporting to necessary state authorities		- There is a legal / regulatory obligation - Legitimate interest of the CDA*
Auditors & Compliance	To audit the activities of the CDA in line with regulation and best practice	All data	- There is a legal / regulatory obligation - Legitimate interest of the CDA*

4 Where you have provided consent

Where we are processing data based on your consent you may withdraw that consent at any time.

5 Who we share Personal Data with.

We take all reasonable measures to protect your personal information while it is in our possession, however, it may be transferred to others where there is a legitimate and lawful reason. This section lists the categories and types of organisations that we may transfer personal data to.

5.1 Delivering our services

Clinical service providers, as required to provide a service appropriate to the specific individual, for example, relevant HSE funded departments and organisations, doctors, speech and language therapists and audiologists.

5.2 Managing our organisation

Professional advisors, industry representation and oversight authorities, Payroll bureau, Insurance companies, Solicitors, Banks.

5.3 Legal / Regulatory Requirements

Regulators, Revenue, Department of Social Protection, a statutory ombudsman, Audit & Compliance, HSE.

5.4 Information technology & support services

Your personal information may also be transferred to third party service providers who process information on the CDA's behalf, including providers of information technology, website hosting and management, data analysis, anti spam services, data back-up, security, e-mail, voice recording and storage services and confidential data destruction.

6 International transfer

The CDA does not currently transfer personal data to any recipients outside of the EEA European Economic Area unless such transfer is to a state that has an EU Adequacy Ruling, is upon a Subject's request, or is subject to an agreement that includes EU standard contractual clauses.

The CDA transfers information to the UK in relation to Sign Language exam accreditation.

7 Responsibility of Subjects and others who provide personal data to us

While engaging with us, you agree that personal information provided by you to us that relates to third parties (e.g. family, carers) for the administration and delivery of services, or while engaging with us in any other way, has been obtained fairly and lawfully and that such information is accurate. You also agree that third parties introduced by you have been made aware of the purpose for which their personal data is being used and that their privacy rights have been upheld.

8 Information relating to children and vulnerable persons

The processing of personal data relating to children receives special attention under law and we shall treat this information with particular care. Children are defined as under 16s in Ireland. Information obtained about children shall comply with the requirement for parental consent and shall receive additional consideration while planning an operational process.

9 Special (Sensitive) Data

The CDA recognises special categories of data, specifically personal data revealing racial or ethnic origin, political opinion, religious or philosophical beliefs, trade union membership, genetic or biometric data, or a subjects health or sexual life. The processing of these categories of information shall typically require consent.

The CDA is a charity delivering support services to people who are Deaf, Hard of Hearing, those who use Cochlear implants or similar assistive technology or who have a hearing or ear related condition such as tinnitus and their families. The processing of special data relating to these service users and circumstances that affect the lives of service users, is an essential part of the service that we provide. The CDA shall only keep data that is necessary for the delivery of service to the service user.

10 Criminal Conviction and Offences

We will only collect criminal conviction data if it is appropriate to the nature of the support work we are offering you or in relation to garda vetting. We process this information on the basis of a legal obligation, our legitimate interest or consent.

11 Confidentiality & Security

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 general procedures in place to protect against any of these things. We also make sure to have secure technology and IT procedures and make sure that contracts with people who provide us services state that they must also have secure technology and IT procedures.

12 Your Rights

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

You have the right:

- a) to be informed about the data we hold on you and what we do with it;
- b) to know the legal basis of why we hold information about you;
- c) to be informed if we are transferring your information internationally;
- d) to know what our legitimate interest is if we are relying on the basis of legitimate interest to handle your personal information;
- e) to know who may transfer your personal information to;
- f) to know the consequences of not providing your personal information to us;
- g) to access the data we hold on you;
- h) to know where we got personal information about you if you did not give it to us yourself;
- i) to take away consent to hold personal information on you if we got the personal information from you on the basis of consent;
- j) to have any wrong data we hold on you to be corrected. This is also known as 'rectification';
- k) to have data deleted in certain circumstances. This is also known as 'erasure';
- l) to restrict the handling of your personal information;
- m) to transfer the data we hold on you to another data controller. This is also known as 'portability';
- n) to object to the inclusion of any information;
- o) to regulate any automated decision-making and profiling of personal information
- p) to lodge a complaint with the Data Protection Commissioner. Contact details can be found at www.dataprotection.ie.

Please note

- There are some limits to these rights.
- You can contact us about your rights by e-mail at privacy@corkdeaf.ie. We will ask for additional information to verify your identity prior to acting upon such requests.

13 Removal from mailing lists

You may unsubscribe from our mailing lists at any time by using the 'unsubscribe' button on marketing communications, or by contacting us at privacy@corkdeaf.ie.

14 Reporting of Data Breaches

If personal information is seen by the wrong person, accidentally destroyed or stolen or we lose control of your data, this is called a data breach. If a data breach happens and it is a risk to the subject, it will be reported to the Data Protection Commissioner. If a data breach happens that is a high risk to you, we will also tell you about it. All data breaches will be handled according to Irish Law and GDPR.

15 Data Retention

We keep personal information about you only for as long as it is necessary and only for the reason that we received it or is required by law. We have rules about how long we keep personal information (data retention). Some of these rules can be seen below. We reserve the right to delete personal information before the data retention time when keeping the information is not absolutely necessary to provide the subject with a service.

Storage of personal data -		
Purpose of processing	Duration	Criteria for the storage of personal data
Service User personal data (adults and children) - for the delivery of non social work services	8 years	From last engagement
Service User personal data (adults and children) – for the delivery of social work services	20 years	From last engagement <i>Note: records created under the child care legislation which must be held permanently.</i>
Irish Sign Language/Deaf Awareness Students	8 years	From date of purchase
Employment/volunteer data	Generally for the duration of employment plus 7 years.	Where categories of data have - regulatory limitations to possible liability, or - mandatory retention periods We will retain for these periods plus one year.
Contact details held for the purposes of marketing	12 months	From the last communication
Incidents or complaint reports	Permanent	
Documentation relating to revenue		Stored as mandated by law plus 12 months
Nothing in this section creates an obligation upon the CDA to keep personal data on behalf of a Subject.		

16 Cookies

While using our web site we use cookies – small text files – which are placed on your hard drives. Cookies are a typical part of operating procedure for most websites and most browsers permit users to opt-out of receiving them if the user would prefer. This may change how well the website works. Our website has a cookie management tool. You can select or change your preferences at any time using this tool.

17 Updates

This Privacy Notice may be updated to be clearer or to comply with changes or clarification in law. The most up to date version of the CDA Privacy Notice is available when a subject asks for it.