

# PsyCare Ireland: Welfare & Harm Reduction.



## PsyCare Ireland Privacy and Data Protection Policy

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# PsyCare Ireland Privacy and Data Protection Policy.

## How we respect privacy when we deal with personal information collected by our organisation

This Privacy and Data Protection Policy applies to information we collect about individuals who interact with our organisation. It explains what personal information we collect and how we use it.

## Privacy Policy

### 1. Personal data that we process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

<b>Purpose</b>	<b>Data (key elements)</b>	<b>Basis</b>
Enquiring about our organisation and its work	Name, email, message	Legitimate interests – it is necessary for us to read and store your message so we can respond in the way you would expect.
Service User Data	First name, physical description, welfare location, reason for visit, arrival notes, substance use, observations, incident reports, & conclusions	Legitimate interests and explicit consent, or in some circumstances to protect vital interests – we must keep service records for insurance and safeguarding reasons. This data is anonymised upon conclusion of a service so no identifiable information remains. It may be used for statistical and scientific research, to improve the service.
Subscribing to email updates about our work	Name, email	Consent – you have given your active consent.
Making a donation	Name, email, address, payment information	Legitimate interests – this information is necessary for us to fulfill your intention of donating money and your expectation of receiving a confirmation message.
Volunteer Management	Name, email, phone number, postcode, gender, birth year	Consent – you have given your active consent.

Members and Trustees Data.	Name, email, phone number, postcode, gender.	Consent – for the purposes about communications regarding: AGMs, EGMs and activities of the charity.
Website functionality	Website activity collected through cookies	Legitimate interests - it is necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you would expect, such as remembering the contents of your order before you have fully completed the process.

## 2. What we do with the information

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy.

For example, we may use your personal information to:

- reply to enquiries you send to us;
- handle donations or other transactions that you initiate;
- where you have specifically agreed to this, send you marketing communications by email relating to our work which we think may be of interest to you.
- to organise and manage teams of volunteers to deliver our services at events
- for generating basic statistics about the service

We do not share information with third parties. We would only share your data if you had provided your explicit consent, or if we were required by law (as per GDPR §6.1c & §9.2f, and the corresponding sections of the Data Protection Act (2018)).

## 3. How we store your information

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

Your data is stored securely in digital format only. Data is stored using Google Drive. Google store information on servers in secure data centres and data is encrypted during transfer from the user's computer, and while it sits on Google Drive servers.

Volunteer data is held for 5 years after the current volunteering period or deleted upon your request after the mandatory forensic period.

## 4. Rights you have over your data

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of all our marketing emails).
- You have the right to ask for rectification and/or deletion of your information.
- You have the right of access to your information.
- You have the right to lodge a complaint with the Data Protection Commission if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Data Protection Commission's website here: <https://www.dataprotection.ie/>

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us.

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

## 5. Cookies & usage tracking

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, eg remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website.

Where cookies are used to collect personal data, we list these purposes in section 1 above, along with other personal data that we collect. However, we also use some cookies that do not collect personal information but that do help us collect anonymous information about how people use our website. We use Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <http://www.google.com/privacypolicy.html>.

## 6. Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and is affected.

## Data Protection Policy

Last updated	04/03/23
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### Definitions

<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person(s)</b>	Michael Ledden, Chris Connors
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by the organization.

## 1. Data protection principles

The organization is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

## 2. General provisions

- a. This policy applies to all personal data processed by PsyCare Ireland, henceforth referred to as the Charity.
- b. The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

## 3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.

c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

#### 4. Lawful purposes

a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task, legitimate interests, or statistical and scientific research purposes ([see DPC guidance for more information](#)).

b. The organization shall note the appropriate lawful basis in the Register of Systems.

c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.

d. Where vital interests are relied upon as a lawful basis for processing data, evidence of incapacity shall be kept with the personal data.

e. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.

#### 5. Data minimisation

a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

#### 6. Accuracy

a. The Charity shall take reasonable steps to ensure personal data is accurate.

b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

#### 7. Archiving / removal

a. To ensure that personal data is kept for no longer than necessary, the Charity will remove data when it is no longer required.

b. The personal data of volunteers will be deleted after the current volunteering period and 5 years of inactivity. Activity is defined by registering availability for events or other communication notifying the Charity that an individual wishes to remain an active volunteer.

#### 8. Security

a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.

b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.

c. When personal data is deleted this should be done safely such that the data is irrecoverable.

d. Appropriate back-up and disaster recovery solutions shall be in place.

## 9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the organization shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to The Data Protection Commission.