

AOSÓG CENTRES CLG

PRIVACY/GDPR POLICY

VERSION 3.0 APPROVED 14 JULY 2023

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1 INTRODUCTION

This privacy policy applies to information Aosóg Centres CLG (“Aosóg”) collects about individuals who interact with our organisation. It explains what personal information the executive Team in the Clare Street office collects and how they use it.

Any comments or questions about this notice can be forwarded to dpo@aosogcentres.ie

2 PERSONAL DATA CONTROLLER

Aosóg is the data controller. As such it is responsible for establishing and maintaining control regarding personal data obtained, used and stored by Aosóg.

For further details, you may contact our designated Data Protection Officer at dpo@aosogcentres.ie by email, or by post at: Aosóg Centres CLG, 6 Clare Street, Dublin 2, D02 EF82

3 PERSONAL DATA THAT WE PROCESS

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

Purpose	Data (key elements)	Basis
Enquiring about our organisation and its work	Name, email address, message	Legitimate interest: it is necessary for Aosóg to read and store the message so that we can reply to enquires.
Making a donation	Name, email, address, payment information, PPS number	Legitimate interests: this information is necessary for us to fulfil the intention to donate money to the Charity and the expectation of receiving a confirmation message from the Charity. We also hold CHY3 forms with name, address, contact and PPSN information in order to allow the Charity to claim tax relief on donated amounts of €250 or more in a calendar year from Charitable Donation Scheme which is operated by Revenue.

4 HOW WE USE DATA

Aosóg will only use data on the basis on which that data was collected, as set out in the table above.

For example, we may use personal information to:

- Reply to enquiries sent to us;
- Handle donations or other transactions initiated by Donors;
- Claim a tax refund on qualifying donations made to Aosóg. If an individual donates €250 or more in a calendar year, Aosóg can claim a refund of tax paid on that donation through the CDS scheme which is operated by Revenue. There is a four-year time limit for making a claim under this scheme. This additional revenue is of huge benefit to the Charity.

5 HOW WE STORE DATA

Data may be stored in two ways:

- Hard copy;
- Digital copy saved in the system.

The hard copies are kept in a secure place. Access involves multiple steps and is not a one-step approach.

Digital copies are saved in the system and are secured by password and can only be accessed by those who need your data to carry out their work as outlined in point 4. above. The network itself is secured with the use of a network firewall with two factor authentication for remote working. The hard disks which contain the data are encrypted such that were the disks to be stolen, the data would not be accessible.

6 WHEN WE SHARE DATA

We will only pass data to third parties in the following circumstances:

- When explicit consent has been provided for us to pass data to a named third party;
- We are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third-party data processors; or
- We are required by law to share data.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

7 HOW LONG WE KEEP YOUR DATA

We 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.

8 RIGHTS YOU HAVE OVER PERSONAL DATA

There are a range of rights over personal data, which include the following:

- The right to ask for rectification and/or deletion of information.
- The right to access personal information.
- The right to lodge a complaint with the Information Commissioner if you feel relevant rights have been infringed.

A full summary of relevant legal rights over data can be found on the Information Commissioner's website here: <https://www.oic.ie>

To exercise these rights in relation to Aosóg over personal data under current legislation, please get in touch with us at the details provided.

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

9 COOKIES AND USAGE TRACKING

Aosóg Centres CLG currently hosts a website: www.aosogcentres.ie

A cookie is a small file of letters and numbers that is downloaded onto your computer when you visit a website. Cookies are used by many websites and can do a number of things, e.g. remember your preferences, record what you have put in your shopping basket, and count the number of people looking at a website.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our service.

Where cookies are used to collect personal data, we list these purposes in section 3 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>.

10 MODIFICATIONS

We may modify this Privacy Policy from time to time. If a modification meaningfully reduces people's rights, we will notify those whose personal data we hold and are affected.