

## Data Protection Statement

### Contents

Introduction .....	3
The Irish Red Cross Society .....	3
Who we are.....	3
Controller contact details .....	3
DPO contact details.....	3
Data Protection Legislation.....	3
Collection and Processing Of Personal Data By the Irish Red Cross .....	4
Why do we process personal data?.....	4
What Personal Data Does The IRC Process?.....	5
Personal data .....	5
Special category data .....	5
Data relating to criminal convictions and offences .....	5
How Does The IRC Collect Personal Data?.....	6
Phone Calls:.....	6
Emails:.....	6
Post: .....	6
Social Media:.....	6
Other online platforms .....	7
CCTV:.....	7
Website: .....	7
In person: .....	7
What Is The Legal Basis For The Processing Of Personal Data By IRC?.....	8
Data processing for specific activities .....	9
A: Pledged Accommodation.....	9

B: Making a donation .....	10
C: Restoring Family Links.....	12
D: Provision of First Aid Services.....	12
E: Membership.....	13
Legitimate Interest – Further Information.....	13
Who Are The Recipients Of Personal Data Processed By The IRC? .....	15
Disclosure to third parties.....	15
Where we store your personal data .....	16
Data Security.....	16
How Long Does The IRC Retain Personal Data?.....	17
Your Data Protection Rights.....	17
Overview and Exercise of Rights.....	17
Restriction of data subject rights in certain circumstances.....	17
Your Right To Complain .....	18
Changes To Our Data Protection Statement.....	18

## Introduction

This Data Protection Statement provides information about the ways in which the Irish Red Cross Society ('the IRC', 'we', 'our', 'us') collects, stores and uses personal data relating to individuals (data subjects). This Data Protection Statement relates to personal data received by the IRC where data subjects contact, or request information from, the IRC directly, and also personal data received by the IRC indirectly, and as set out below.

## The Irish Red Cross Society

### Who we are

The IRC is a body corporate established under statute. You can find out more about our activities at [www.redcross.ie](http://www.redcross.ie). We are a registered charity (Charity Number 20005184), and our Head Office is at 16 Merrion Square, D02 XF85, Ireland.

### Controller contact details

The IRC is the controller for the personal data it processes. You can contact us in a number of ways, which are set out on the [contact](#) page of our website.

### DPO contact details

If you wish to contact our Data Protection Officer in relation to the processing of your personal data by the IRC, you can do so by e-mailing [dpo@redcross.ie](mailto:dpo@redcross.ie).

## Data Protection Legislation

There is a legislative framework in place in Ireland which sets out and supports the rights of individuals in relation to the use of their personal data. This includes the General Data Protection Regulation (GDPR). The GDPR came into force on 25 May 2018 and significantly changed data protection law in Europe, strengthening the rights of individuals and increasing the obligations on organisations. The GDPR is designed to give individuals more control over their personal data. (A copy of the GDPR is available [here](#)).

Although the GDPR is directly applicable as a law in all Member States, it allows for certain issues to be given further effect in national law. In Ireland, the national laws, which amongst other things, give further effect to the GDPR, are the Data Protection Acts 2003-2018.

The supervisory authority in Ireland for the GDPR and other legislative frameworks around data protection is the Data Protection Commission. More information about the DPC, including how to engage with them if you are unhappy with how your personal data has been handled is available at [www.dataprotection.ie](http://www.dataprotection.ie)

## Collection and Processing Of Personal Data By the Irish Red Cross

### Why do we process personal data?

The IRC processes personal data for a number of different purposes, including its humanitarian work and legal obligations. The circumstances under which personal data may be processed by the IRC include, but are not limited to:

- Responding to queries received by email, telephone, online, in person, or by any other means
- Processing donations, pledges and any other offer of support
- Processing applications for, and operating and supporting the network of Irish Red Cross members and volunteers
- Establishing and operating programmes to provide support to communities in need of support, including in partnership with government and other organisations, both domestically and internationally
- Communicating and working in partnership with the international network of Red Cross, Crescent and Crystal organisations, including the International Committee of the Red Cross (ICRC) and the International Federation of the Red Cross (IFRC)
- Providing first aid or other services
- Organising and delivering training, in First Aid or any other area

- Liaising with a wide variety of public and private organisations in relation to the IRC's regulatory, legal and operational obligations and roles, including maintaining records as appropriate
- Promoting the work of the Irish Red Cross domestically and internationally, on social media and through other communication channels
- Undertaking fundraising activities to support the work of the Red Cross both domestically and internationally

### What Personal Data Does The IRC Process?

#### Personal data

The IRC processes personal data received by the IRC where data subjects contact, or request information from, the IRC directly, and also personal data received by the IRC indirectly.

The personal data that we process includes

- (i) basic personal information, such as a data subject's name / surname; date of birth; the company or organisation a data subject works for;
- (ii) contact information, such as a data subject's postal address, email address and phone number(s); and
- (iii) any other personal data that is provided to the IRC during the course of its work.

#### Special category data

The IRC also processes special category data. Such special category data may include personal data relating to racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data; biometric data for the purpose of uniquely identifying a natural person; data concerning health; and data concerning a natural person's sex life or sexual orientation.

#### Data relating to criminal convictions and offences

The IRC also occasionally processes personal data relating to criminal convictions and offences, generally in the context of Garda Vetting activities.

## How Does The IRC Collect Personal Data?

The IRC collects data through a number of mechanisms, either directly from data subjects themselves, or indirectly from other sources. Ways in which the IRC collects personal data include:

### Phone Calls:

Where an individual contacts the IRC by phone, caller numbers are automatically stored on the recipient phone in the IRC in a list of inbound and outbound calls. The IRC may record personal data received by it during the course of phone calls such as in the form of notes made on the relevant file. Data received through phone calls may also be further processed for the purposes of progressing the case to which they relate.

### Emails:

All emails sent to the IRC are processed for the purposes of the matter/case file to which the email relates. The sender's email address will remain visible to all staff tasked with dealing with the query. Please be aware that it is the sender's responsibility to ensure that the content of their emails does not infringe the law. Unsolicited unlawful material, together with the details of the sender, may be reported to An Garda Síochána and/or other relevant authorities and further emails from such recipients may be blocked.

### Post:

All post received by the IRC is processed (including scanning copies where appropriate) and stored for the purpose of the matter to which the post item relates.

### Social Media:

The IRC also receives personal data through its social media interactions, including on Twitter, LinkedIn and Instagram. Messages or posts received by the IRC on these, or any other, social media platforms are viewed by the IRC and personal data received in this way may be further

processed as required, such as for the purposes of responding to queries, or forwarding a request to the relevant IRC contact.

#### Other online platforms

IRC also receives personal data through other online platforms, including those operated by the ICRC and shared with other Red Cross Societies around the world, such as the ASPERA secure documentation system and the Restoring Family Links website, database and associated tools. Personal data received in this way may be further processed as required, such as for the purposes of responding to queries, or forwarding a request to the relevant IRC contact.

#### CCTV:

IRC operates closed-circuit television at our premises in Merrion Square and has posted signs in this regard. The purpose for our processing of personal data collected by the CCTV in operation at our offices is for security and safety.

#### Website:

The IRC website ([www.redcross.ie](http://www.redcross.ie)) uses certain cookies. Our Website & Cookie Policy can be accessed [here](#). IRC also receives personal data through our website, through the use of online forms. This includes where members of the public contact IRC for the purposes of making pledges or donations, making a complaint, or filling in a survey.

#### In person:

IRC can receive personal data given in the context of providing services such as First Aid, training or other events, or in any other circumstances where people engage with the IRC in person. Personal data received in this way may be further processed as required, such as for the purposes of responding to queries, for compliance or audit purposes (for example in the context of healthcare provision) or forwarding a request to the relevant IRC contact.

## What Is The Legal Basis For The Processing Of Personal Data By IRC?

There are a number of legal bases on which the IRC may process your data, depending on the purposes of our use and the risks to your privacy. These bases are set out in Article 6 of the GDPR, and include the following.

- a. Where you have given consent to the processing of your personal data for one or more specific purposes. An example of where this legal basis may apply is where the IRC collects personal data for the purposes of providing you with first aid care. Where we process by consent, such consent should be specific, informed and given voluntarily. Please note that you can withdraw your consent at any time by emailing [dpo@redcross.ie](mailto:dpo@redcross.ie) with that request. Withdrawal of consent shall not affect the lawfulness of the processing based on said consent before its withdrawal.
- b. Where processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. An example of where this legal basis may apply is in the case of the IRC's engagement with third party service providers;
- c. Where processing is necessary for compliance with a legal obligation to which the controller is subject. An example of where this legal basis may apply is if the IRC is obliged to disclose personal data held by the organisation under a court order, or where we retain personal data for compliance purposes, such as reporting to a regulatory body;
- d. Where processing is necessary in order to protect the vital interests of the data subject or of another natural person. An example of where this legal basis might apply is in the provision of emergency first aid care;
- e. Where processing is necessary for the performance of a task carried out in the public interest;
- f. Where processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. An example is where we respond to a query you have made.



## Data processing for specific activities

This section sets out more detail on some specific activities that may involve the processing of your personal data. The information below is also available as separate 'Fair Processing Notices' for each activity.

### A: Pledged Accommodation

When you engage with us around pledged accommodation, either as a potential pledger or a potential beneficiary, you provide your personal data to us. This may include your name address and contact details, as well as PPSNs and other data. We process this data for the purposes of giving effect to pledges, including:

1. Validating and checking the suitability of your pledge.
2. Entering the pledge data on CRM systems for the purposes of effective pledge management. The Department of Children, Equality, Disability, Integration and Youth is the joint controller of this data, and they can be contacted at [www.gov.ie/dcediy](http://www.gov.ie/dcediy)
3. Coordinating with other agencies for the purposes of operating and managing the CRM and the matching of pledges with beneficiaries.
4. Making follow up contact with pledgers and beneficiaries in relation to giving effect to pledges. Such contact may be by telephone, email, post, fax or any other means of communication the details of which have you have shared with us and may be initiated by us or by our partner agencies as set out below.

We rely on consent you give when you register for these activities, as well as our legitimate interest in matching pledgers with beneficiaries to give effect to pledges. Where you have given consent, you can withdraw consent at any time by emailing [dpo@redcross.ie](mailto:dpo@redcross.ie) . Withdrawal of consent does not affect any legitimate processing which took place prior to the withdrawal.

In carrying out our work in relation to pledges, we may share your personal data with third parties. Set out below is a list of third parties with whom we work in relation to the pledged accommodation and with whom your personal data may be shared. This includes the following organisations and bodies (please note that this list may change over time):

- Department of Defence
- Department of Children, Equality, Disability, Integration and Youth
- Department of Justice
- Deloitte
- An Garda Siochana
- Local Authorities
- Engineers Ireland
- Institute of Professional Auctioneers and Valuers (IPAV)
- Arup Consulting Engineering
- International Organisation for Migration (IOM)
- Peter McVerry Trust (PMVT)
- Helping Irish Hosts (HIH)
- SalesSense Ltd
- TEKenable Ltd

## B: Making a donation

When you make a donation you provide us with your personal data, including your name, address and contact details. We process this data for the purposes of giving effect to your donation and staying in touch with you, including:

1. Processing and allocating your donation through our banking and fundraising systems. This includes the use of third party, secure payment and CRM providers including (please note that this list may change over time):

- Paypal
- Stripe

- Care CRM
- IRaisier
- Donorbox
- Loqate

2. Making follow up contact with you in relation to your donation. Such contact may be by telephone or email (if you have given us consent to do so) or by post or any other means of communication the details of which you have shared with us. The purposes of follow up contact may include:

- Sharing the story of how your donation has helped IRC and its beneficiaries
- Asking you to consider becoming a regular donor
- Sharing information about other IRC activities that may interest you, including fundraising activities and appeals

We sometimes use third party service providers to support communications with our donors, and when we do so, your personal data may be shared with them for this purpose. Examples of third party providers we may use in this regard include (please note that this list may change over time):

- Mango Direct Marketing
- Character Print solutions
- Tico Print Works
- Mailchimp
- Azure Communications
- Mail Hit Media

3. Keeping a record of donations made by you and our communications with you
4. Claiming tax relief income through the Charitable Donation Scheme (ROI)

We rely on consent you give when you make a donation, as well as our legitimate interest in staying in touch with our donors in processing your data. Where you have given consent, you can withdraw consent at any time by emailing [dpo@redcross.ie](mailto:dpo@redcross.ie). Withdrawal of consent does not affect any legitimate processing which took place prior to the withdrawal.

#### C: Restoring Family Links

When you register with the Restoring Family Links (RFL) Service, you provide us with your personal data. We rely on both consent and legitimate interest to process your personal data for the purposes of supporting you, including:

1. Creating, maintaining and updating a record of your case on the RFL database. Please note that the RFL database is maintained in Geneva, Switzerland by the International Committee of the Red Cross (ICRC) and the ICRC is a joint controller of your data in this regard. Contact details for the ICRC are available at <https://www.icrc.org/en/contact>
2. As required, contacting partner agencies, including domestic agencies and other Red Cross societies in relation to your case
3. Following up with you in relation to your case as required

#### D: Provision of First Aid Services

When you engage with us for the purposes of receiving first aid, you may provide us with your personal data, including special category data. In these circumstances, we rely on consent and compliance with legal obligations to process your data for purposes related to your care, including:

1. Liaising with third parties such as other health care providers. We have a separate policy on Consent to Examination and Treatment which sets out how consent in the context of healthcare provision is managed.
2. Recording details of your engagement with us, including completion of record forms such as an Ambulatory Care Record (ACR) or Patient Care Record (PCR) as required.

3. Retaining and processing your records for audit, regulatory and compliance purposes, including reporting to the Pre-Hospital Emergency Care Council (PHECC)
4. Following up with you in relation to your case as required

#### E: Membership

When you apply to or become a member of the Irish Red Cross, you provide us with your personal data. In these circumstances, we rely on consent, legitimate interest and compliance with legal obligations to process your data for purposes related to your membership, including:

1. Completing your membership application, including sharing details with An Garda Síochana for the purposes of Garda Vetting
2. Creating a membership record for you
3. Staying in contact with you in relation to your membership or other Irish Red Cross activities
4. Recording details of your engagement with us as a member
5. Retaining and processing your records for audit, regulatory and compliance purposes

#### Legitimate Interest – Further Information

We may use and process your personal information where it is necessary for us to pursue our legitimate interests as an organisation. This includes for the following purposes:

- Processing necessary for us to promote our activities and services and measure the reach and effectiveness of our campaigns;
- To manage relationships with our donors, beneficiaries and other stakeholders;
- For analysis and insight conducted to inform our strategies, and to enhance the experience of all our stakeholders;
- To tailor and personalise our communications based on your attributes and interests;

- To fulfil and complete transactions entered into with us;
- To send you an electronic communication if you have closed your browser while processing a transaction;
- To identify and record when you have received, opened or engaged with our Site or social media or other electronic communications (please see our [Cookie Policy](#) for more information);
- In some cases, we may use automated methods to analyse, combine and evaluate information that you have provided to us. We collect and analyse this information in this way so that we can deliver the most appropriate customer experience to you by tailoring and making relevant all our services and communications;
- Processing necessary for us to support you with your enquiries;
- To respond to correspondence, you send to us and fulfil the requests you make to us;
- Processing necessary for us to respond to changing market conditions and the needs of our stakeholders;
- To analyse, evaluate and improve our products and services so that your visit and use of our site, social media pages and services are more useful and enjoyable (we will generally use data amalgamated from many people so that it does not identify you personally);
- To generate reports to domestic and international stakeholders and funders (we will generally use data amalgamated from many people so that it does not identify you personally);
- To undertake analysis and research (including contacting you with surveys) so that we can better understand your needs;
- For product and service development purposes;
- Processing necessary for us to operate the administrative and technical aspects of our organisation efficiently and effectively;
- To administer our website, and our social media pages and for internal operations, including troubleshooting, testing and statistical purposes;

- For the prevention of fraud and other criminal activities;
- To verify the accuracy of data that we hold about you and create a better understanding of you as a stakeholder;
- For network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- To comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you, we will keep a record of this in order to be able to comply with your request);
- For the purposes of corporate restructure or reorganisation of our operations, services or assets;
- For efficiency, accuracy or other improvements of our databases and systems, for example, by combining systems or consolidating records we hold about you;
- To enforce or protect our contractual or other legal rights or to bring or defend legal proceedings;
- To inform you of updates to our terms and conditions and policies;
- For other general administration including managing your queries, complaints, or claims, and to send service messages to you.

## Who Are The Recipients Of Personal Data Processed By The IRC?

### Disclosure to third parties

The IRC will not trade your personal details with third parties. We may share your information with selected third parties including:

- Third parties which allow us to process your donation or purchase and/or provide you with the service you have signed up for. For further information, see the data processing for specific activities section of this document, or individual fair processing notices
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you
- Analytics and search engine providers that assist us in the improvement and optimisation of our site

- Where we are required to disclose it in order to comply with any applicable law, a summons, a search warrant, a court or regulatory order, or other statutory or legal requirement.

### Where we store your personal data

All digital information you provide to us is stored on secure servers. Any payment transactions will be encrypted and are made through our payment partners. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential; you should not share your password with anyone.

The data that we collect may be transferred to, and stored at, a destination outside the European Union ("EU"). It may also be processed by staff operating outside the EU who work for us or for one of our suppliers. In order to safeguard your information we will always work to ensure that any such transfers are in strict compliance with data protection legislation. By submitting your personal data for such purposes, you agree to this transfer, storing or processing as required. We will take all reasonable steps necessary to ensure that your personal data is processed securely and in accordance with this Data Protection Statement. Where data is stored in non-digital form, we work to ensure that it is held in a secure manner and in line with good practice.

### Data Security

Your personal data is held on secure servers. However, the nature of the online environment is such that we cannot guarantee the security of any information transmitted or held in digital format to be fully secure. However, once we receive your personal data we take all reasonable technical and organisational measures to protect personal data from loss, misuse, alteration or destruction and to prevent any unauthorised or unlawful disclosure or processing. Where data is transferred to another party, we work to ensure appropriate technical and organisational safeguards are used to protect your personal data.



## How Long Does The IRC Retain Personal Data?

The retention periods for personal data held by the IRC are based on legislative requirements and on the purpose for which the personal data is collected and processed. For example, in the case of responding to a query, we will retain personal data for as long as is necessary for the handling of the query and for any subsequent action that is required, as well as for compliance purposes. Please contact [dpo@redcross.ie](mailto:dpo@redcross.ie) if you have

## Your Data Protection Rights

Under data protection law, data subjects have certain rights.

Subject to certain restrictions, which are set out below, you can exercise these rights in relation to your personal data that is processed by the IRC.

### Overview and Exercise of Rights

The data subject rights are:

1. The right to be informed about the processing of your personal data;
2. The right to access your personal data;
3. The right to rectification of your personal data;
4. The right to erasure of your personal data;
5. The right to data portability;
6. The right to object to processing of your personal data;
7. The right to restrict processing of your personal data;
8. Rights in relation to automated decision making, including profiling.

For more information on any of your rights in the context of the processing of your personal data by the IRC, please email [dpo@redcross.ie](mailto:dpo@redcross.ie)

### Restriction of data subject rights in certain circumstances

Article 23 of the GDPR allows for data subject rights to be restricted in certain circumstances. In addition, the 2018 Act contains certain provisions dealing with the restriction of rights of data subjects. The Data Protection Commissioner has published general guidance in relation to the

application of Article 23 and the related provisions of the Data Protection Act 2018, which is available [here](#).

### Your Right To Complain

If you have any concerns in relation to the manner in which we process your personal data, you can contact us on [dpo@redcross.ie](mailto:dpo@redcross.ie). If you are dissatisfied with how we process your personal data, you have the right to complain to the DPC as the Irish supervisory authority. General guidance as to how the Commission handles complaints can be accessed [here](#).

### Changes To Our Data Protection Statement

This Data Protection Statement is kept under regular review and is therefore subject to change. The most up to date version of the statement will be posted on our website.

If you have any comments or queries in relation to this Data Protection Statement, please forward same to [dpo@redcross.ie](mailto:dpo@redcross.ie).