

# Cairde Privacy Notice

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## **Who we are**

Cairde (alternatively “the organisation “we” or “our”) is a community health development organisation working to reduce health inequalities among minority ethnic communities in Ireland. Founded in 1985 it is a registered charity with The Charities Regulator and headquartered in Dublin. Registered Charity Number 20024550.

## **What we do**

Cairde is dedicated to reducing health inequalities among minority ethnic communities in Ireland by improving minority ethnic access to health services and minority ethnic participation in health planning and delivery.

Where we process certain information relating to you, such as your name, date of birth, email address, phone number, address, gender, physical characteristics, or location data ('personal data'), we are responsible for the protection of such data as a "Data Controller". In countries with data protection laws, it is a requirement that any organisation processing your personal data needs to tell you how we will manage it.

For this privacy notice, Cairde applies standards and practices based on the EU GDPR and the Irish Data Protection Acts 1988 to 2018.

A separate, additional data protection notice is applicable and is made available to all staff and vendors of Cairde.

For European legislative requirements Cairde is registered with the Irish Data Protection Commission as our supervisory authority on data protection for EEA territories.

### **How to contact us**

Cairde is based at 19 Belvedere Place, Dublin 1, Ireland. You can contact us by telephone on +353 1 855 2111 or by email on [info@cairde.ie](mailto:info@cairde.ie)

For any queries related to the management of your personal data please contact our designated Data Protection Officer through [info@cairde.ie](mailto:info@cairde.ie)

### **What personal data we handle**

#### **Personal Data provided by you to Cairde**

We handle the personal data that you provide to us when you engage with us to access any of our services.

These services include when you request us to represent you, to assist with your health related needs, if you attend a meeting we host, when you ring us seeking information on other services, when you use the 'healthconnect' app, call the National Roma Infoline, and during training sessions.

We may also ask you to help us carry out research that informs our work when we are lobbying for improvements to health services and health related services for migrant communities.

We will also handle your personal data should you submit a query or comment on our website form or to us by email or phone.

If you are seeking to develop or explore career opportunities with Cairde you may send us your CV. This could be received by Cairde based on an advertised post or sent speculatively by yourself to Cairde.

## Personal Data not provided by you

If you have asked us to represent you to assist with accessing services, we may receive information about you from other statutory and voluntary services providers or other professionals who you have engaged with previously and have a lawful reason to have some personal data about you that they think relevant to share with us in Cairde.

From time to time, we may be given basic biographical detail about potential clients from other service providers. These service providers may have identified Cairde as being a suitable partner to be engaged with a client of theirs and so they may contact us about you. In this case while we may store your contact details for a short period, we would not open a client file on you until we had secured your consent to do so.

## Personal Data processed for support/administrative purposes

We also process personal data for other support/administrative purposes required to help Cairde achieves its organisational aims. This personal data could include; the personal data of visitors to the Cairde premises; the personal data of visitors to the Cairde website who go through any material on the website and may need to allow cookies in order to use the service; the personal data of participants who attend our training online, and in person, and the personal data of our followers or social media users that leave comments or reactions to our posts on any of our social media channels (e.g. Facebook, LinkedIn, WhatsApp, Twitter, and similar platforms).

## What we do with your data

For the purposes of managing and developing our organisation, Cairde performs the following processing operations in accordance with applicable data protection laws.

1. **Provides online services** – Cairde processes personal data such as strictly necessary cookies for any user of our websites, [www.cairde.ie](http://www.cairde.ie) and [www.healthconnect.ie](http://www.healthconnect.ie) We do so in order for you to use the web forms we provide for the purpose of handling enquiries, to make suggestions on accessing services based on your location and in order for you to use our online resources. Our lawful basis for processing this data is based on the consent you have provided to us.
2. **Represent you and your health interests to other people and groups** – part of our core service is to act as your representative, at your request, to assist you with accessing services, including but not limited to the health and social care sector. In this work we may write letters and emails, make phone calls, and meet with people on your behalf. We could share with outside people and agencies sensitive private information in order to try secure appropriate services to you. Our lawful basis for the processing this is based on the consent you have provided to us.
3. **Inform you of upcoming events and news** – should you join any Cairde facilitated group, have used our services previously or sign up for any newsletter or informational emails we will use the contact details you have provided us to contact you a schedule of upcoming events and relevant sector related news, topics of interest and developments.

Our lawful basis for processing this data is based on the consent you have provided to us.

4. **Process any applications we receive, solicited or unsolicited, for Cairde job, volunteer, or intern opportunities** – in this case we will process your data on the basis of the consent you have provided to us, demonstrated by the act of sending us your application.
5. **Research** – we may process your personal data for the purpose of capturing your experience or opinion on issues to assist our lobbying and promotional work on improving health and social services for migrants and also improve our insight on some matters. We may carry out specific focus group sessions to understand topical issues e.g., one focus group we undertook to gain an improved insight to explain the reluctance for Roma to be vaccinated against Covid 19. While published research will always be aggregated and anonymous, some of the qualitative data could carry some risk of identification. Our lawful basis for processing his data is based on the consent you have provided to us.
6. **Client surveys** – similar to our research activities, if you have used our services in any way, we may ask you to rate the quality of the service and give suggestions on any improvements. The survey results and any specific commentary you provided would only be used internally for Cairde to improve services. We may use anonymised commentary or results in reports to our partners who provide funding and other support to enable us to continue our work. Our lawful basis for processing this data is based on the consent you have provided to us.
7. **Participate in promotional or educational material** – As part of our work we may ask you to participate in a audio-visual recording that we may use to promote our work or use as a educational and awareness tool. Our lawful basis will be based on the consent you have provided to us.
8. **Interact with you (in general)** – Cairde uses your contact details (including but not limited to your name, surname, gender, email address, telephone number, postal address) to communicate with you. Our lawful basis for processing your contact details is based on the consent you have provided to us.
9. **Respond to your enquiries** – Cairde receives a wide spectrum of queries from its clients and some of these queries may contain information that directly, or could indirectly identify, individuals. We have established managerial and technical measures in place to protect the confidentiality of this data. Our lawful basis to process such data is that its is necessary for Cairde legitimate interest. Where we receive unsolicited personal data from members of the public and it would not be in our legitimate interest to process it without substantially impacting on the rights and freedoms of others, we will delete such personal data and inform the sender of our action and reason(s) as to why.
10. **Comply with legal obligations** – we may share information with other public authorities if they are required by law, in particular other statutory agencies. Our legal basis to do so is based on our legal obligations under data protection law. Examples include cooperation with regulatory and investigative agencies and bodies that monitor health and safety issues.
11. **Performance of a contract we have with you** – when we deal with service providers and suppliers in their individual capacity or otherwise process personal data from third parties with whom we have a contract, we manage such data for the purposes of fulfilling our obligations pursuant to the contract as our legal basis for so doing.

12. **Manage social media accounts** – Clicks on links we provide on our website to social media accounts may be counted in aggregate based on the URL and not on any personally identifiable information. We also process personal data when managing our social media accounts as individuals interact with our pages on those platforms. We view comments/reactions on our accounts, and these are retained by the social media platform in question. Our lawful basis for processing is that such processing is in Cairde legitimate interest to develop its network and online presence.

There may be certain cases where your right to receive information prior to our processing of your personal data is restricted in accordance with the law.

For example, if the information collected from you, (including any personal data of yours), is of assistance for the prevention of a terrorism related offence, we may be obliged by law to report it police. Or, where Cairde is sent an email containing unlawful material, it may be necessary for Cairde to report the information to the relevant authorities without any prior information provided to the original sender.

### **What we do not do with your personal data**

**Sell your personal data** – Cairde will not sell/trade/swap to any third party any of your personal data.

**Novel, experimental or beta technology** – Cairde will not use your personal data on products, tools and technologies that are novel, experimental or undertested. This, for the time being, includes the use of your personal data in the training of any Machine Learning data sets and the use of other AI tools for making predictions and assessing preferences.

**Automated decision making** – Cairde and the third parties which process personal data on our behalf (“processors”) do not undertake any profiling or automated decision making within the meaning of those activities under data protection laws.

**Direct marketing** – Cairde and the third parties which process personal data on its behalf (“data processors”) do not undertake any activity with your data for the purposes of direct marketing, within the meaning of data protection laws.

**Registration of telephone conversations** – Cairde does not record phone conversations. Where an individual contacts us by phone, caller numbers are automatically stored on the recipient phone in Cairde for a limited time in a list of inbound and outbound calls, and if there is likely to be ongoing engagement with the person that number and the first name of the person will be saved on their device.

### **How long do we keep your data?**

The length of time in respect of which we keep personal data depends on the processing operation carried out with the data and we will retain it for no longer than is necessary.

In practice this means, for example, that if you send your CV in response to an advertisement and you are not successful, we will retain your CV from one year after the post has been filled.

Client details and correspondence will be retained for as long as you remain a client and for a maximum of five years after our last engagement with you.

Attendance at any of our events and training will be retained for one year following the event, at which point it will be anonymised and aggregated for the purpose of providing business analysis.

Any personal data that could be subject to any legal action or be reasonably assumed it might be required in relation to any legal proceedings will be retained as long as the legal action is ongoing and for two years following the final resolution of the legal action.

For further detail or specific enquires on our data retention schedule which outlines the retention periods for the processing of the personal data controlled by Cairde you can contact our Data Protection Officer with your query on [info@cairde.ie](mailto:info@cairde.ie)

### **When do we transfer your data to third countries?**

Various data protection laws around the globe have certain restrictions and/or rules to follow before personal data can be transferred from one country to another country. Under EU law the countries in the European Economic Area are treated as a single territory (i.e. transferring data from, for example, Ireland to Germany is considered to be an internal transfer and not to a 'third country'.)

Cairde does not have any requirement or need to transfer any of your personal data to third countries nor does it envisage having to do so in the foreseeable future. Any changes in this regard will be reflected in an amended privacy notice and, where applicable, directly informing those affected.

### **Who we share your data with**

Personal data processed by Cairde is held confidentially and is not shared with any third parties except where legally required, you have agreed, or it is to protect you or another person from harm.

The main exchange of personal data that will occur outside of Cairde would be with service providers in the health sector and housing/shelter sector. These service providers may be other charities, Local Authorities or independent housing bodies, GPs, the HSE or a private health care professional. Any bodies or persons we share your health data with will always be registered health professionals or their support staff with a legal, contractual and/or ethical obligation of confidentiality.

Depending on the circumstances of the case, third parties may process personal data on behalf of Cairde ('data processors') and are therefore under the legal obligation to ensure the same level of security and confidentiality in carrying out their processing operations as

Cairde. The organisation has in place legally binding agreements with data processors that detail these obligations and respective responsibilities.

These third parties referred to are service providers and suppliers in order to perform our functions as outlined above. These third parties in particular process personal data on our behalf and we have in place specific arrangements which are mandated by applicable data protection laws. They would include companies that sell software, companies that oversee our IT security and maintenance, facility maintenance companies and recruitment companies, if we engaged one.

### **Your rights on your data**

Subject to certain restrictions you can exercise the following rights in relation to your personal data that is processed by Cairde.

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 and the right to withdraw consent;
7. The right to restrict processing of your personal data.

These rights are not absolute and Cairde may exercise the restrictions as they are articulated in the GDPR in relation to the rights listed above. These restrictions can be reviewed in the text of Articles 12 to 22 of the GDPR. [www.gdpr-info.eu](http://www.gdpr-info.eu)

Other restrictions to your rights as a data subject may apply in other circumstances, for example when the Cairde processes personal data in the context of legal proceedings.

### **How to make a complaint**

You have the right to lodge a complaint about how we handle your personal data to the competent supervisory authority, which in Europe will be the Irish Data Protection Commission.

They can be reached at;

21 Fitzwilliam Square South  
Dublin 2  
D02 RD28  
Ireland

Tel +353 1 7650100

Or through this weblink [www.dataprotection.ie/en/contact/how-contact-us](http://www.dataprotection.ie/en/contact/how-contact-us)

### **Changes to this statement**

This statement is kept under review and is subject to change. We recommend that you regularly visit our website to ensure that you are consulting the latest version of the statement. You can find a reference to the date of the last update on the top of this statement.

### **Questions or feedback?**

If you have any questions or comments on this notice, please contact us or our Data Protection Officer at [info@cairde.ie](mailto:info@cairde.ie)