Privacy statement for HLI Ireland

Human Life International (Ireland) (HLI (Ireland)) (registered charity number 20029814, Charities Regulator Republic of Ireland, and Company No: 214375) is committed to ensuring that your privacy is protected. This statement sets out how and why we collect and use your personal information, and how we protect it. If we ask you to provide certain information by which you can be identified, it will only be used in accordance with this privacy statement and with the Irish Data Protection Act 1988/2003 and the ePrivacy regulations 2011 & GDPR policies.

We may update this statement from time to time; for example, to keep it up to date or to comply with legal requirements. You will be able to view any such changes on our website. This is important; we hope you will take time to read it carefully.

For more information, please visit the Data Protection Commission. https://www.dataprotection.ie/

What information we collect about you?

We may collect the following information:

- Full name and title (Including preferences of how you like to be called)
- Gender
- Contact information including address and post code. This can also include place of work.
- Phone numbers and email addresses
- social media IDs/UserNames (eg: Facebook, Skype, Hangouts, WhatsApp)
- Bank account details (if donating or purchasing a service by bank card/bank transfer/standing order)
- Date of birth or age range
- IP address
- Photos, videos or audio recordings used as part of our work with you
- CCTV which is in use at our premises
- Religion
- Other information you have provided to us which is relevant to your support for the charity or use of its services

If you are taking part in an event or volunteering for us we may also collect:

- information relating to your health
- Emergency next of kin details

If you sponsor a person using an online giving platform such as Just Giving and you indicate that you would like to hear from us, then they may pass on your contact details to us so that we can tell you more about our Charity. You should read the Privacy Statements of sites such as Just Giving, before you give them your information.

NOTE: If you make a donation or a purchase on the website you will be asked to provide your credit/debit card number, HLI will not receive these details, they will be encrypted through a secure service.

• If you set up a standing order we will require your BIC and IBAN numbers (which will be securely retained).

Special circumstance: If you are a user of our Pregnancy Services, we may additionally collect the following information which falls into "special categories of data". This is in order to conduct your appointment effectively.

- Personal details about you such as name, date of birth, marital status, address, next of kin, contact details (mobile phone number) etc. We request identification from all clients who attend appointments.
- Information relating to your health with particular reference to your reproductive health. You may wish to disclose to us information relating to your sexual health for example (example: STD's and STI's).
- Socio-economic information (for the purpose of research).
- Racial or ethnic origin, religious or philosophical beliefs, other data concerning health or data concerning a person's sexual relations with others.

How we use it?

We require this information for the following reasons:

- Internal record keeping
- thanking you for your donations, volunteering, or other support
- responding to you if you have made an enquiry
- keeping you up to date with what is happening at Human Life International (Ireland) via our newsletter, either by post, email or WhatsApp. We will always let you know how you can opt out of receiving this
- improve our fundraising activities and the services we provide to the community
 and to you. This could be looking at demographics to help our education,
 marketing and future mission plans. We do this to understand if our plans for
 mission delivery and activities are what you and the public want and ensure we
 spend our money in the best way. If you come to our events, we may use your data
 statistically to improve our understanding but this will not identify you as a
 person.
- sending letters or emails or WhatsApp about fundraising events which we think may interest you using the contact details you have provided
- asking you to support a particular fundraising initiative. We will always let you know how to opt out
- processing purchases and donations
- conducting supporter research for the purposes of furthering our charitable objectives. We use a tiering system to ensure supporters are looked after in the way they want. This helps us prioritise our resources and tailor the information we send. We'll offer to work with those currently supporting us or interested in making a major gift to Human Life International (Ireland), through a relationship which offers individuals personalised opportunities for support, communication, access to events and individual tailored management. (For further information joining this programme of support please contact mail@humanlife.ie)
- to allow you use interactive features on our website, when you choose to do so. For example, we may help you auto-complete forms by inserting your contact details for you to edit
- helps us to know information such as the number of visits to the website from different local areas

• to protect staff and visitors to our site. To protect staff, visitors and to protect the organisation against theft, the site may have CCTV installed

If you use our Pregnancy Services:

- to respond to you if you have made an enquiry
- to be able to provide and conduct appointments effectively if you use our Pregnancy Services
- to deliver a tailor-made appointment specifically suiting your needs
- to book and remind you of appointments and to deliver follow-up service
- to review the care and treatment provided so that it is of the highest standards for you and for others. This can be carried out by conducting patient satisfaction surveys during the exit and follow-up process
- to investigate complaints, legal claims and adverse incidents
- Prepare anonymized statistics on our Pregnancy Information Centres/Services' performance and monitor how we allocate our resources.

Who we work with?

We work with other companies to provide services on our behalf, including sending postal mail, emails and WhatsApp; checking our supporter's personal information is accurate and up to date (which is a legal requirement), advertising our services, and processing payments. We will only provide these companies with the information they need to deliver the service. We do comprehensive checks on these companies before we work with them, and we aim to ensure contracts we enter into meet our (and your) expectations and requirements.

HLI Ireland will work to protect your data from loss, misuse, unauthorised access or disclosure, or alteration. HLI will respect your privacy and will not sell or provide your details to other organisations for their own marketing purpose.

Legal basis for processing

We process your data to meet our charitable objectives and further our charitable aims.

It's important for us to engage with members of the public so that we can promote our work and talk about our mission as a charity. We will only use your data in this way if we are sure it is ok to do so, and have thought about the effect it would have on you. Some examples of things we do which use 'legitimate interests' as a reason are:

- Sending you direct marketing in the post or email (where allowed).
- Doing research to understand our supporters and customers and improve the services we offer to supporters and customers.
- The use of CCTV in some areas for monitoring and security reasons.
- Handling any compliments or complaints in line with our policy.

Some processing of data may be carried out to perform a contract with you – such as purchasing a ticket or a product, or it is required by law or other regulatory rule - such as the completion of due diligence for fraud detection purposes, or obligations for

processing Tax Relief on your donations according to the Charitable Donations Scheme (Ireland) or Gift Aid (UK and NI).

We will only use your email or telephone information to contact you for fundraising or promotional purposes if you have provided your consent, or via email if you have made a purchase and we feel you may wish to know about other similar products or services. We may rely on legitimate interest to contact you by post but we will always carry out an assessment beforehand to ensure that the way we use your data is fair and does not exceed what you would reasonably expect to receive from us.

You will always be given the opportunity to opt out of communication by any channel at any time, and we will always make it clear to you how to do this.

We may also use your personal data where there's an immediate risk to your health, or the health of a minor for whom you are in loco parentis (vital interest). For example, if we're worried about your health or safety at one of our events, or whilst using one of our services.

Some activities are also done in the public interest (public task). For example, collecting personal data about safeguarding concerns raised by a retreat attendee.

Pregnancy Services: 'Special categories of data' are defined by the GDPR and include things like racial and ethnic origin, religious or philosophical beliefs, genetic data, biometric data, health data, sex life details and sexual orientation. We only process information that you choose to declare to us. Processing is lawful where it is undertaken by or under the responsibility of a "health practitioner".

A health practitioner is defined as:

A person who in the circumstances owes a duty of confidentiality to the data subject that is equivalent to that which would exist if that person were a health practitioner (i.e. Client Advocates/ Receptionist).

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online and elsewhere. Your personal data is held on a secure server hosted by our hosting service provider.

The nature of the Internet is such that we cannot 100% guarantee or warrant the security of any information you transmit to us via the Internet to be 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.

Pregnancy Services:

The information you submit will be kept confidential (unless we are required by law to share information with relevant authorities) and with the highest standards of security. To this end, we do not store paper records of your details.

Only staff that have a strict need to see your information will be able to access your information. They will only have access using password-protection and restricted access and will only see information that is strictly necessary for the purpose of delivering the appointment.

We will not share your information with 3rd parties. The ultrasound scanning that we provide is limited and non-diagnostic in nature. All scans are stored on a secure system.

For further information on our Security Data Breach policy and procedures please see:

Privacy_Data_Breach_Policy

How long do we keep your data?

Data is kept for no longer than is necessary for the purposes for which the personal data is being processed and as per our Data Retention policy.

Links to other websites

Our website may contain links to other websites of interest, including to our social media pages. However, once you have used these links to leave our site, you should note that we do not have any control over that external website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide to them, as it is not governed by this privacy statement. We advise that you look at the privacy statement applicable to the website in question.

Your rights

Under the General Data Protection Regulation (GDPR) and Irish ePrivacy Regulations (2011) and the EU Directive known as the Law Enforcement Directive you have the following rights:

- The right to be informed: to be told about why we collect your information, what it is used for and who we share it with
- The right of access to your information normally within 1 month and free of charge.
 Following the submission of a written request the HLI Controller will provide a
 copy of any information relating to the requestor without undue delay. Where
 personal data is not collected from you personally, any available information as to
 its source will also be provided. Any reference to other individuals in the data will
 be removed or redacted. This deadline may be extended to two months in certain
 situations.
- The right to rectification to ensure if your information is wrong to make sure we correct it
- The right to erasure: to have your information deleted or forgotten in certain circumstances. In particular, this right is important for HLI where we may have collected personal data from a child in the past and where, as an adult, the Data Subject now has a different viewpoint of the risks involved in the processing. (Note that the general age of consent under the GDPR is 16 years and Ireland has introduced a national threshold of 13 years);

- The right to restrict processing: to ask for your information not to be shared
- The right to not be subject to a decision based solely on automated processing
- The right to data portability: for us to give you a copy of your information in a structured, commonly used and machine-readable format for example, on a disk, electronic file or paper. There are exceptions to this right.
- The right to object: to your information being held, used, shared, or stored in certain situations

NB: If you request that we do not contact you again for marketing purposes, we will respect your wishes. It may take up to 1 month for you to stop receiving marketing communications from us as some communications are scheduled in advance. After this time, we may still send you administrative communications, for example in relation to payments you have made or events you have signed up to take part in.

NB: If you ask not to receive any fundraising communications from us, please be aware that your personal information may still retained and marked to prevent you from receiving any communications, to allow us to have our work independently audited and to meet our legal obligations.

How to request access to information we hold about you

If you would like a copy of the information held on you please request this in writing to the HLI address in the following table. It is important that you provide satisfactory evidence of identification and a sufficient description of the information that you are looking for. Please be specific if requesting information from using Pregnancy Information Centres.

The Data Controller Human Life International (Ireland). Guadalupe Centre, Main Street, Knock, Co. Mayo, Rep. of Ireland.

Correcting information held about you?

If you believe that any of the information we are holding on you is incorrect or incomplete, please contact us as soon as possible, so that we can correct the information.

We appreciate your support and aim to ensure that your privacy is treated with respect at all times in compliance with Irish Data Protection Act 1988/2003 and the ePrivacy regulations 2011 & GDPR policies.

Contact Preferences

You can also control the means by which we contact you, e.g. telephone, post, email. You can change your contact preferences at any time by contacting us using the details below:

Human Life International (Ireland). Guadalupe Centre, Main Street, Knock, Co. Mayo, Rep. of Ireland.

Telephone: +353 94 9375993

E-mail: mail@humanlife.ie

Complaints

HLI (Ireland) take your rights seriously and we aim to resolve any issues directly with you to reach a speedy and satisfactory solution.

In the unlikely event that a resolution cannot be successfully reached you may then wish to raise a complaint with the Irish Data Protection Commission (DPC), see table following.

Data Commissioners of Ireland can be contacted at;

The Office of the Data Protection Commissioner

Canal House Station Road

Portarlington

Co. Laois

LoCall: 1890 252231 Tel: 057 8684800 Fax: 057 8684757

Email: info@dataprotection.ie Website: www.dataprotection.ie

Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited.

How do I change my cookie settings?

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit www.aboutcookies.org or www.allaboutcookies.org

Find out how to manage cookies on popular browsers:

Google Chrome

Microsoft Edge

Mozilla Firefox

Microsoft Internet Explorer

Opera

Apple Safari

To find information relating to other browsers, visit the browser developer's website.

To opt out of being tracked by Google Analytics across all websites, visit http://tools.google.com/dlpage/gaoptout