



## LWL Data Protection Privacy Statement

### 1. INTRODUCTION

LWL is committed to respecting the privacy, and protecting the personal information of all individuals who share their information with us in the course of our work as well as individuals who use our website, communications and social media channels, in compliance with the EU General Data Protection Regulation (GDPR). This Privacy Statement sets out how we collect, use and store your personal information, (any information that identifies or could identify you). LWL is committed to upholding the rights of individuals in relation to the holding of personal data. GDPR requirements for data controllers means that data must be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and, where necessary, kept up-to-date
- Retained only for as long as necessary
- Processed in an appropriate manner to maintain security.

### 2. WHO WE ARE

LWL is a registered charity and social enterprise based in Longford Town, Co. Longford. We provide a wide range of services including childcare, domestic violence support, counselling and training & education to women and families in Longford. We are a 'data controller' and we are responsible for, and control the processing of, your personal information.

#### **Address:**

LWL CLG  
Willow House  
Ardnacassa Avenue  
Longford  
Co. Longford

Telephone: 043 3341511  
Email: [info@lwl.ie](mailto:info@lwl.ie)  
LWL Charity No. CHY 11744  
LWL Registered Charity No. 20032937  
Company Registration No. 241515

### 3. YOUR INFORMATION – WHAT WE COLLECT, WHY AND HOW WE USE IT

Personal information collected by LWL may include details such as your name, email address, postal address, telephone number and bank details (suppliers/fee paying service users). LWL may also collect information from members of the public who

get in touch with us, or attend one of our events. We use this information to keep you informed about other events which may be of interest to you, to help improve our services and to keep a record of our communications with you.

From time to time, we may invite selected individuals and organisations to attend specific events in relation to advocacy, training or networking. If you have requested information about a job or volunteering opportunity with LWL, we also collect that information so that we can fulfil your request. If you request information about one of our services or projects by phone, website, social media or in person at our centre, we collect this information so that we can make sure you receive the help/service you need.

### **3.1 WHAT DO WE USE YOUR INFORMATION FOR?**

We use information for several purposes including:

- Awareness-Raising
- Advocacy and Campaigning
- Supporting the delivery of services to service users
- Financial procedures / Processing transactions
- Human Resources
- Fundraising

### **3.2 SENSITIVE PERSONAL INFORMATION**

LWL takes additional precautions to safeguard sensitive information stored or processed on your behalf and treats this information with the utmost confidentiality. As per Data Protection legislation, some categories of personal information are more sensitive and can include information on people's health, race, ethnic origin etc. We will only process this information to deal with your enquiry or for training and quality monitoring or evaluating the services we provide. We will not share your information with anybody without your express permission except in exceptional circumstances. Examples of this may include: self-harm, or threat to others or in situations of child protection issues such as physical abuse or exploitation.

## **4. HOW LONG DO WE STORE YOUR INFORMATION?**

If you have made a financial donation to LWL, we store financial records of donations for a period of 7 years, as required by Revenue for audit purposes. If a donor has requested to have their contact details removed before this date, this financial information is anonymised.

If you have applied for an employment or volunteering role with LWL we store all applications from candidates, along with interview records for 7 years.

## 5. LEGAL BASIS FOR USING YOUR INFORMATION

LWL processes all personal data lawfully, fairly, transparently and in line with the relevant EU GDPR legislation. LWL will only use your personal information if:

- We have asked you and have a record of your express consent for us to do so;
- We have a **'Legitimate Interest'** to do so in order to support our charitable purposes. Our use will be fair and balanced and never unduly have an impact on your rights.
- We have a **contract** with you that we can only fulfil by using your personal information, e.g. to send you information that you have requested or if you have signed up to participate in an event;
- We have a **legal obligation** to obtain information about you, e.g. we are required by law to keep records of donations that we receive for 7 years according to Revenue.

We will not unduly prioritise our interests as a charity over your interests as an individual. We will always balance our interests with your rights. We will only use personal information in a way and for a purpose that you would reasonably expect. We promise to always be open and honest with you about your information and how it is used.

### 5.1 WHAT THIS MEANS:

LWL operates on the basis that you are happy to stay in touch with us to find out about our work and how you can connect with us and therefore are content for us to keep and use your personal information for the lengths of time specified below. If you do not wish us to follow these general guidelines, please contact us and let us know.

We may contact you with information and updates about our services and/or ways that you might like to get involved or support us further. This may be by post, email, phone or text message, according to your preferences. We will also continue to ask whether you are still happy to hear from us and in which ways.

## 6. EMAILS

If you wish to opt out of our emails, which you can do via the unsubscribe link at the bottom of every email we send. You can also phone 043 3341511 or email [info@lwl.ie](mailto:info@lwl.ie) to unsubscribe at any time.

You can always tell us to change your communication preferences and our use of your information at any time. You can do this at any time by phoning us on 043 3341511 or emailing [info@lwl.ie](mailto:info@lwl.ie)

## 7. KEEPING YOUR INFORMATION SAFE

LWL takes looking after your information very seriously and have adopted appropriate physical, technical and organisational measures to protect your personal

information. Your information is stored securely on our server in Ireland, which is maintained and updated by our IT service provider CTS. Our server is protected by a Firewall Wall, and VPN security. Access to the server is via user profiled access passwords. Backups are taken nightly in a separate building to support disaster recovery and business continuity. All laptops and desktop computers are encrypted and lock automatically after being idle for 4 minutes. LWL has a processing contract in place with CTS who GDPR compliant and there In relation to hard copies of information e.g. consent forms, parental forms etc., these are stored in secure cabinets and are only accessed by the appropriate staff. We have strict agreements/contracts in place with all external service providers to ensure the highest levels of security and safety. Finally, all LWL staff must sign a confidentiality agreement prior to commencing employment with us.

## **8. DATA PRIVACY ONLINE**

### **8.1 OUR COMMUNICATIONS PLATFORMS**

LWL works with individuals, groups, practitioners and service providers. We use our website and our social media platforms to communicate the work that we do and to share information about LWL news and events.

If you sign up for our mailing list via our website, you will from time to time receive notifications on our events, training and may also be invited to give feedback on our work.

### **8.2 WHAT DATA DO WE COLLECT ON OUR WEBSITE?**

LWL's website uses cookies, small text files which are placed on your computer or device as you navigate a website. We use Google Analytics cookies to tell us about levels of activity on our website, for example which pages on the site are used more frequently. This information helps us to improve and enhance our website.

We do not collect any personal details about you using cookies. Any of the data or information that we gather using cookies is anonymised and only used to help us improve our website. We don't use it for other purposes, such as donations or advertising, and we won't share this information with others unless we are legally required to do so.

You can read Google's Privacy Policy here:  
<https://policies.google.com/privacy?hl=en>

### **8.3 SUBSCRIBING TO OUR MAILING LISTS**

If you would like to keep up to date with our work, you can subscribe our mailing lists to receive updates about our work and give your consent to be notified about upcoming events and initiatives. We use Salesforce, a third party email platform, to distribute our information.

When you subscribe to our mailing lists we ask you for your name, contact details and your area of work. Your data is held within this third party platform. Salesforce

has its own security and privacy policy; separate to LWL's and holds its data in the USA. The GDPR does not require EU personal data to stay in the EU, nor does it place any new restrictions on transfers of personal data outside the EU. Salesforce state that their data processing addendum, which references their Binding Corporate Rules, Privacy Shield certification, and the European Commission's model clauses, will continue to help Salesforce customers legalize transfers of EU personal data outside of the EU.

## **8.4 HOW WE PROTECT YOUR PRIVACY**

LWL is committed to respecting your privacy. Your data may be held within third party platforms which we use, including Salesforce and Mailchimp. All of these platforms have published up to date privacy policies to comply with the GDPR.

Access to those platforms and your data is strictly limited to relevant service managers who will have the necessary passwords.

## **8.5 OPTING OUT**

If at any time you decide that you no longer wish to hear from us you can unsubscribe from our mailing list. At the bottom of our emails or other communication, you will be given the option to unsubscribe. When you click on this option we will remove your name from our mailing list.

You can also adjust the settings in your browser to decline cookies. This may have an impact on your experience of our website.

# **9. YOUR RIGHTS**

## **9.1 RIGHT OF SUBJECT ACCESS**

As part of our commitment to respecting your privacy you have the right to request details on the personal data we collect about you as you explore our website. This right includes information on who processed your data as well as when and why it was processed. You also have the right to request a copy of your personal data.

If you want to access your personal data or find out how it has been used by LWL please write to us at Willow House, Ardnacassa Avenue, Longford and include your name, contact information and details on what you would like to know. We will endeavour to respond to your request within 30 days.

Your Right of Access is among a number of individual rights provided for by data protection regulations. For more information on these rights please click here: <http://gdprandyou.ie/>

## **9.2 PERSONAL DATA AND YOUR RIGHTS**

You have rights over your personal data, and you are in control of how your information is used. These rights are not absolute, and some qualifications and restrictions do apply. In summary your rights are:

- The Right to withdraw consent
- Right of access
- Right to rectification
- Right to be forgotten
- Right to restrict processing
- Right to object
- Right to refuse automated decision making and/or profiling
- Right to portability

You also have the right to seek compensation through the courts in the event that your data privacy rights have been infringed.

If you believe your privacy rights have been violated, you may file a complaint with us or with the Data Protection Commissioners Office.

<https://www.dataprotection.ie/docs/Home/4.htm>

Contact Details for the Office of the Data Protection Commissioner  
Address: Data Protection Commissioner, Canal House, Station Road, Portarlinton, Co. Laois.

Telephone: +353 57 8684800 / +353(0)761 104 800 / Lo Call No. 1890 252231  
Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)

Changes to your personal information or preferences:  
From time to time we may contact you to ensure that the information you have provided us with remains accurate and up to date.

Should you wish to change your preferences you can do this any time:

**By Post:**  
LWL CLG  
Willow House  
Ardnacassa Avenue  
Longford

**By Email:**  
[info@lwl.ie](mailto:info@lwl.ie)

**By Phone:**  
043 3341511