Public Facing Privacy Notice

IDENTITY

WHO ARE WE?



The Dublin Inner Community Co-operative Society delivers a comprehensive range of community development programmes and activities across Dublin's inner city. We receive funding from a number of government departments and statutory agencies.

We are a co-operative with a Board structure comprising 14 individuals including an independent chairperson and 13 member organisations. We are legally registered with the Register of Friendly Societies, registration number 5628R. We are also a registered charity with the Charities Regulatory Authority, registration number 20107079.

We are an alliance of 13 separate independent Dublin Inner City community development organisations each providing a diverse range of activities under different funding schemes including delivering services under the national Social Inclusion and Community Activation Programme ("SICAP"). SICAP aims to tackle poverty, social exclusion and long-term unemployment through local engagement and partnership between disadvantaged individuals, community organisations and public-sector agencies. National social inclusion programmes such as SICAP make a real difference to those in our communities who are suffering disadvantage, poverty and exclusion.

Our Membership comprises the following organisations:

- Lourdes Youth and Community Services
- South Inner City Community Development Association
- North West Inner City Network
- South West Inner City Network
- New Communities Partnership
- o Inner City Organisations Network
- Daughters of Charity Community Services
- o Inner City Enterprise
- North Wall Community Development Project
- o Robert Emmet Community Development Project
- Community After Schools Project
- Nascadh Community Development Project
- o An Siol Community Development Project
- For the purpose of the Data Protection Acts 1988 and 2003 (as amended) and from 25 May 2018, the General Data Protection Regulation (the GDPR) (the Acts):

 Each member organisation of Dublin City Community Cooperative is a data controller as an employer, and when dealing with suppliers and users of its services including the registering of personal and sensitive personal information of individuals for SICAP.

Our data protection contact is:

Noel Wardick, Chief Executive Officer, Unit 1 Killarney Court, Buckingham Street, Dublin 1. Email: nwardick@dublincitycommunitycoop.ie

WHAT INFORMATION DO WE COLLECT?

WHAT PERSONAL INFORMATION DO WE COLLECT FROM YOU?

You may give us personal data by:



- Corresponding with us by phone, e-mail or otherwise. We ask you to disclose only information necessary to provide you with information about our organisation's work or services.
- Applying to work with us. The type of information you may provide in your CV, a cover letter, your name, address, e-mail address and phone number. CVs should include information relevant to your employment history and education (degrees obtained, places worked, positions held, relevant awards, and so forth). We ask that you do not disclose sensitive personal information (e.g. gender, height, weight, medical information, religion, philosophical or political beliefs, financial data) in your application.
- If you work in our organisation as an employee, we collect further information as part of a contract of employment and provision of those services to us as employer;
- Supplier information when we engage services from you such as email address and contact details;
- Engaging with the services and programmes provided by Dublin City Community Cooperative delivered under various programmes including the SICAP programme. The SICAP programme delivers services in the following areas:
 - Children and families
 - Disadvantaged young people (15-24)
 - Disadvantaged women
 - Lone parents
 - Low income households and workers
 - New communities
 - People with disabilities
 - o Travellers
 - o Roma
 - Unemployed
 - Disengaged and economically inactive

The information collected may include/includes:

- Contact details (first name, last name, address, Eircode, email, home number and mobile)
- Non-official address
- Date of registration meeting to engage with our services
- Gender
- Date of birth
- PPSN (not compulsory, provided voluntarily)
- Age band 15 to 65
- Principal economic status (including economically inactive)
- Employment type
- Education level
- Nationality
- Gender
- Ethnicity and cultural background
- Disabilities and illness
- Target group
- New communities
- Ethnic / cultural background
- Household situation (financial and job situation)
- Supports
- Personal action plan
- Record of your activity with engagement with services
- Survey and evaluation information

WHY DO WE COLLECT THIS INFORMATION?

We collect the information in order to provide you with relevant, appropriate and individually tailored local services, programmes and activities, to provide follow on services, to improve, evaluate and manage our work, to recruit staff, to administer HR related matters (e.g. payroll), to pay our suppliers and to meet our legal and funding requirements.

We will use this information:

- To create a profile for you if you are a prospective employee or enter into a contract for the provision of employment services;
- To administer and improve our activities and for internal operations, including troubleshooting, data analysis, testing, research & evaluation, statistical and survey purposes;
- To pay suppliers for their services;
- As part of our efforts to keep our site safe and secure;
- Registering you to avail of funded programmes and SICAP services;

- Advocacy;
- Internal and national reporting obligations.

The legal bases for the processing of your personal data are:

- Processing necessary for the performance of a contract which you have entered into with us or to take steps at your request prior to entering into a contract;
- Processing necessary for compliance with a legal obligation to which we are subject;
- That you have provided consent for the processing for one or more specified purposes;
- Processing necessary for the purposes of the legitimate interests where such interests are not overridden by your interests or fundamental rights or freedoms which require the protection of your information.

The legal bases for the processing of your special category or sensitive data are:

- Processing necessary for the performance of a contract which you have entered into with us or to take steps at your request prior to entering into a contract;
- Processing necessary for compliance with a legal obligation to which we are subject.
- In the case of SICAP services where you have given us explicit consent to process your information in order to deliver appropriate services to you.

THIRD PARTY ACCESS TO YOUR PERSONAL DATA

WHO DO WE SHARE THIS INFORMATION WITH?



We may share your personal data with our selected business associates/ suppliers and contractors when and where necessary to provide you with our services and to provide those services in a professional appropriate manner. For example, these business partners may include our web hosting provider, our payroll provider (regarding employee information), our programme monitoring quality & control provider and our IT service providers.

In addition, we may be legally obliged to disclose your personal information to third parties:

- The Department of Rural and Community Development, POBAL and Dublin City Council for auditing purposes in relation to the expenditure of public money;
- Department of Employment Affairs & Social Protection;

- Local government agencies;
- If we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect our rights, property, or safety, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

DISCLOSURE OF YOUR INFORMATION

We may also share your information with selected third parties including:

- Government agencies and expenditure oversight agencies;
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.

We attach at **Schedule 1** a list of all entities with whom your personal data may be shared with under the circumstances listed above.

MINIMISATION

HOW LONG DO WE KEEP HOLD OF YOUR INFORMATION?



The time periods for which we retain your information depends on the type of information and the purposes for which we use it. We will keep your information for no longer than is required or legally permitted.

Personal data and sensitive personal data collected by us for the SICAP programme is subject to a European Audit and therefore EU retention limits apply.

For further information on the periods for which your personal data is kept, please contact us directly.

TRANSFERS

DO WE TRANSFER YOUR INFORMATION OUTSIDE THE EUROPEAN UNION OR EUROPEAN ECONOMIC AREA?



In general we do not transfer your information outside the European Union or European Economic Area.

The data that we collect from you may very occasionally and in very limited circumstances be transferred to, and stored in the United States or outside the European Economic Area ("EEA") for which there is currently the EU-US Privacy Shield certified programme. For example, if you provide us with data related to Survey Monkey surveys which Dublin City Community Cooperative occasionally conducts this data may be retained in Cloud systems where storage may be controlled from the US or outside the EEA.

YOUR RIGHTS

WHAT ARE YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA?

You have the following rights:



- The right to access the personal data we hold about you.
- The right to require us to rectify any inaccurate personal data about you without undue delay.
- The right to have us erase any personal data we hold about you in circumstances such as where it is no longer necessary for us to hold the personal data or, in some circumstances, if you have withdrawn your consent to the processing.
- The right to object to us processing personal data about you such as processing for profiling or direct marketing.
- The right to ask us to provide your personal data to you in a portable format or, where technically feasible, for us to port that personal data to another provider provided it does not result in a disclosure of personal data relating to other people.
- The right to request a restriction of the processing of your personal data.

Where our processing of your personal data is based on your consent to that processing, you have the right to withdraw that consent at any time but any processing that we have carried out before you withdrew your consent remains lawful.

You may exercise any of the above rights by contacting our Data Protection Contact person, **Noel Wardick**, <u>nwardick@dublincitycommunitycoop.ie</u>.

You may lodge a complaint with your local supervisory authority with respect to our processing of your personal data. The local Supervisory Authority in Ireland is the Data Protection Commissioner. The website is www.dataprotection.ie.

CHANGES TO THIS POLICY

WHAT WILL HAPPEN IF WE CHANGE OUR PRIVACY NOTICE?



This notice may change from time to time, and any changes will be posted on our site and will be effective when posted. Please review this notice each time you use our site or our services. This notice was last updated on 24th May 2018.

CONTACTS

HOW CAN YOU CONTACT US?



Our Data Protection Contact, Noel Wardick-CEO, can be contacted as follows:

By phone: 01-8557015

Address: Unit 1 Killarney Court, Buckingham Street, Dublin 1

On our website contact form: www.dublincitycommunitycoop.ie

Or by email: nwardick@dublincitycommunitycoop.ie

Schedule 1

We have set out below a list of third parties with whom we may share your data where we are obliged to do so:

Third party name	Description of services provided
Microsoft Office 365, Dropbox, Thesarus	Cloud services
Dublin City Council	DCC provide funding for programmes to Dublin City Community Cooperative. As such we have legal obligations regarding compliance and programme & financial reporting
ENCLUDE and Ozmen IT Services	To maintain our IT network and infrastructure including the SICAP database (IRIS).
Public Auditors POBAL	Audits in respect of the oversight of expenditure of public monies and also IRIS
Auditors and Tax Advisors	Ryan & Associates
Pension Advisors	Pension services
Department of Employment Affairs & Social Protection	Legal obligation to disclose certain information
Revenue	Legal obligation to disclose certain information
Charities Regulatory	Legal obligation to disclose certain

Authority	information
Registry of Friendly Societies	As a cooperative we are legally obliged to disclose certain information
Sunflower Recycling	Shredding services
Contractors	To carry out services for us necessary to the running of our organisation
Banks	To pay staff and suppliers
Survey Monkey	From time to time Dublin City Community Cooperative conducts online survey applications on a range of issues