



## Alzheimer Society of Ireland - Data Protection - Fair Processing Notice

**Who are we?** The Alzheimer Society of Ireland is a company limited by guarantee and a registered charity in the Republic of Ireland (CHY 7868).

**What do we do?** The Alzheimer Society of Ireland (ASI) works within communities across the country providing dementia related services such as day care, home care, respite, dementia advisors, support groups, social clubs and a National Helpline. We process personal data (identifying information) and special category personal data (more sensitive data such as health information) to carry out this work.

**Who do we process data about?** ASI processes data about service users and their carers/family members/representatives to provide health and social care. ASI does not engage in profiling or automated decision making with your data.

**What kind of data is processed by us?** ASI processes different types of personal data and special category personal data for the purpose of providing you with health and social care services. We will process all or some of the following data to cater for your needs: Contact name, address, telephone number, email, health data, details of carer/family member/representative, life stories. The ASI National Helpline does not record calls. Recorded messages requesting a call back are deleted on receipt and not stored digitally. Facebook messages to the ASI account are also received by the helpline. These are deleted after receipt but the social media platform could access this data or retain a copy. If you are concerned by this please contact us by phone or email.

**Where did we get your data from?** We collect data when you or your carer/family member/representative contacts us at the helpline to request information on services available or to ask for advice. The line can be used anonymously.

**What are our legal grounds for processing?** In order to provide health and social care services:

- ASI processes personal data on the legal basis of legitimate interests. (Article 6.1.f GDPR) *It is within the legitimate interests pursued by ASI to efficiently and effectively manage our provision of health and social care for service users and their carers/family members/representatives while ensuring compliance with duties of care and other obligations.*
- ASI processes special category personal data on the legal basis of the provision of health and social care. (Article 9.2.h GDPR) *This occurs when the special category personal data relates to a service user or a potential service user.*
- ASI processes special category personal data on the legal basis of association / not-for-profit organisation. (Article 9.2.d GDPR) *This occurs when the special category personal data relates to someone other than the service user, e.g. a carer, family member or representative who has regular contact with ASI. This data is not shared outside the charity without the individual's consent.*

**How long do we retain your data?** ASI as a wider organisation keeps personal data and special category personal data for a range of periods. The helpline retention period for all files created as a result of a call received is set at 12 months. On a case by case basis, records may be retained for longer where they are required for legal reasons or for the management or mitigation of operational or strategic risks to the organisation. In the rare instances that records are subject to this kind of review the ongoing retention will be assessed bi-annually.

**Where do we keep your data?** Service providers contracted by ASI hold personal data in digital form in secure data centres inside the EU/EEA. The AIS IT Security and Usage policy details the internal security provisions in place. Hard copy data is stored in locked cabinets and secure rooms.

**Do we share your data?** In the context of service provision at ASI the National Helpline sets itself apart and we don't share your data with any other department or section of the charity. A shared facebook.com account is the only exception to this, so you should contact us directly by phone or email if this concerns you. Neither do we share your data with any external health or social care professionals unless you specifically request it. Overarching laws may dictate that ASI must share your data with state entities e.g. law enforcement, health authorities and regulatory bodies. In these situations we will nevertheless prioritise your privacy by attempting to satisfy the request by first offering only pseudonymised or anonymised data. We also interface with third party service providers that can access your personal data. These situations are managed by data processor agreements which contain clear contractual safeguards for individuals and their data.

**What are your rights?** Individuals have rights over their personal data under EU and Irish Data Protection law. These rights are not absolute and qualifications or restrictions can apply. In summary your rights are: Right to be informed; Right of access; Right to rectification; Right to be forgotten/erasure; Right to restrict processing; Right to object; Right not to be subject to automated decision making and/or profiling; Right to portability. You also have the right to make a complaint to the Office of the Data Protection Commissioner [info@dataprotection.ie](mailto:info@dataprotection.ie) or to seek compensation through the courts.

**How can you contact the ASI Data Protection Officer?**

**Address:** DPO, The Alzheimer Society of Ireland, National Office, Temple Road, Blackrock, Co. Dublin.

**Email:** [dataprotection@alzheimer.ie](mailto:dataprotection@alzheimer.ie)