



Data Protection Statement

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

What do we do? ASI works within communities across the country providing dementia related services such as day care, home care, respite, social clubs, dementia advisors and a national helpline. The ASI also advocates for the rights and needs of all people living with dementia and their carers or families. We process personal data (identifying information) and special category personal data (more sensitive data such as health information) to carry out this work. We are also engaged in training, research, fundraising, direct marketing, office administration, finance, HR administration including payroll and recruitment. We manage relationships with corporate partners, contractors, a spectrum of volunteers involved with ASI to differing degrees, and liaise closely with the HSE as the main statutory funding authority.

Who do we process data about? ASI processes personal data about employees, service users and their carers/family members/representatives, volunteers, donors, advocates, supporters, contractors, suppliers and employees in sponsor companies or partner organisations. ASI does not engage in profiling or automated decision making.

What kind of data is processed by us? ASI processes different types of data depending on how and why you are interacting with us.

Purpose	Categories of data processed
Health & Social care provision	Health data, contact names, addresses, telephone numbers, email, photographs, attendance records, and regular update reports for carers.
Advocacy & Communications	Contact names, addresses, telephone numbers, email, social media identifiers, photographs, videos and health data.
Training	Contact names, addresses, email, assignments, training records, health data.
Research	Contact names, addresses, telephone numbers, email, health data.
Office Administration & Finance	Contact names, contact details, tax identifiers (e.g. PPSN for employees / VAT number for service providers), bank details, legal claims, timesheets, data associated with accounts receivable or accounts payable.
Direct Marketing & Fundraising	Contact names, contact details, PPSN for donors, bank details, health data.
Human Resources	Contact names, contact details, PPSN for employees, CE scheme data, attendance/leave records, staff ID numbers, bank details, training records, references, CVs, Garda vetting information, medical certificates and occupational health data.
Safety & Security	Occupational health data, accident & incident reports, safeguarding information, location data and CCTV recordings.
Website management	Google Analytics data including IP addresses (see cookie policy), contact names, contact details and bank details if purchase made through online shop.

Where did we get your data from? We receive data about you when: you apply for a position or come to work for ASI; you or your carer contact us to request you become a service user; a health or social care professional shares data with us by way of a referral; when you contact us to become a volunteer, donor, training course participant or advocate; when we complete a business transaction with you as a supplier of products/services; or as a customer of our online shop. We may have your personal data because your company or organisation has entered into a partnership with ASI. In limited circumstances data is publicly available and there would be a reasonable expectation that an organisation such as ASI would process it, for example, if you are a journalist, medical expert, academic, politician, business leader or celebrity.

What are our grounds for processing? In each instance that ASI processes your personal data and/or special category personal data it is reliant on one of the following legal grounds depending upon how or why you are interacting with us.

Purpose	Legal basis
Health & Social care provision	Legitimate interests <ul style="list-style-type: none">It is in the interests of ASI to efficiently and effectively manage our day-care, home-care, respite, dementia advisors, social clubs and helpline services for service users or carers and ensure compliance with duties of care and other obligations. Legal Obligation Provision of health and social care Vital Interests Association / Not-for-profit organisation
Advocacy & Communications	Legitimate interests <ul style="list-style-type: none">It is in the interests of ASI to promote the human rights and philosophical message of the charity across various media, through lobbying to secure change or developing partnership relationships. Consent (can be withdrawn at any time) Association / Not-for-profit organisation Data made public by the individual
Training	Legitimate interests <ul style="list-style-type: none">It is in the interests of ASI to efficiently and effectively provide suitable training courses for our staff and for carers and family members of people with dementia. Necessary for execution of a contract Association / Not-for-profit organisation Consent (can be withdrawn at any time)
Research	Consent (can be withdrawn at any time) Legitimate interests <ul style="list-style-type: none">It is in the interests of ASI to conduct research among our own service users in order to formulate evidence based policies. It is in the interests of ASI to collaborate with select external academic researchers, although participant data is not shared with ASI. Association / Not-for-profit organisation
Office Administration & Finance	Legitimate interests <ul style="list-style-type: none">It is in the interests of the ASI to process information for general administration and compliance with accounting or revenue requirements. Legal obligation Necessary for execution of a contract Field of employment law and social security legislation Defence of legal claims
Direct Marketing & Fundraising	Consent (can be withdrawn at any time) Legitimate interests <ul style="list-style-type: none">It is in the interests of ASI to engage in postal direct marketing or develop sponsorship/partnership relationships.
Human Resources	Necessary for execution of a contract Legal obligation Legitimate Interests <ul style="list-style-type: none">It is in the interests of ASI to efficiently and effectively manage staff and ensure compliance with duties of care and other obligations. Field of employment law and social security legislation Association / Not-for-profit Vital Interests Defence of legal claims
Safety & Security	Legitimate Interests <ul style="list-style-type: none">It is in the interests of the organisation to process data about health and safety issues for the purposes of seeking legal advice and supporting insurance risk assessments Legal obligation Defence of legal claims Field of employment law and social security legislation Vital Interests
Website management	Consent (can be withdrawn at any time) Statutory obligation Necessary for execution of a contract

How long do we retain your data? ASI keeps personal data and special category personal data for a range of periods. Our retention schedule, which is reviewed annually, details our current policies which are based on:

- Statutory obligations;
- Contractual obligations;
- Quality assurance / best practice obligations set by state entities or regulatory bodies;
- Our view that retention is necessary for the original purpose or a compatible purpose;
- For reasonable periods after the conclusion of engagements for quality assurance and risk management purposes.

On a case by case basis, records may be retained for longer where they are required for actual or potential legal actions or the management or mitigation of operational or strategic risks to the organisation. Where records are subject to this kind of review the ongoing retention will be assessed annually.

Where do we keep your data? Service providers contracted by ASI generally hold personal data in digital form in secure data centres inside the EU/EEA. The ASI IT Security and Usage policy also details the internal security provisions in place. We also utilise a number of third party services which necessitate the transfer of personal data to, for example; the U.S. by relying on Standard Contractual Clauses / Privacy Shield or Canada by relying on the country's adequacy status. We continually monitor the legality of such cross border transfers. Hard copy data is stored in locked cabinets and secure rooms.

Do we share your data? In the context of service provision, we may share your data with external health or social care professionals or a relevant medical facility in order for you to receive the best standard of care. We may be legally obliged to share your data with state entities, e.g. for employment or financial compliance. Relevant categories of recipients include the tax authorities, government departments, law enforcement and regulatory bodies. ASI receives HSE funding under Section 39 of the Health Act 2004 and as a result may be contractually obliged to share certain data. In relation to the above entities we will always prioritise your privacy by offering pseudonymised or anonymised data if we believe this should be sufficient. 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. Finally, it should be noted that our staff are trained to respond in an emergency, or if they believe you could be in danger, and they will share your personal data in order to ensure your safety.

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. If you believe your data privacy rights have been infringed you have the right to make a complaint to the Data Protection Commission info@dataprotection.ie or to seek compensation through the courts. ASI is committed to helping individuals exercise their rights..

How can you contact our Data Protection Officer?

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

Email: dataprotection@alzheimer.ie

We will update this data protection statement from time to time. Any updates will be made available and, where appropriate, notified to you.

Ends.