

Peacehaven Trust Policy Document				
<i>Previous policy name: N/A</i>				
Linked with the following documents				
Rev. No.	Approved PHT Management Team	Approved by PHT Board	Launched Staff Members	Operational Period
1 Feb 2018				3 Years

1.0 Purpose

This policy outlines to members of the public and other interested parties the type of data Peacehaven Trust may gather on members of the public through interface with them via the www.peacehaventrust.com website. This policy also specifies how Peacehaven Trust will gather, retain and use information from individuals seeking employment within Peacehaven Trust.

2.0 Scope

This policy is applicable users of the Peacehaven Trust web site, applicants for employment, and other interested parties.

3.0 Introduction

Peacehaven Trust is largely dependent on the Health Service Executive to fulfil their charitable objectives: however the Trust values the contributions of supporters from the community, both in prayer and financially. Having a positive relationship with our supporters is vitally important to us and we are committed to working in a transparent, ethical, responsible and honest way.

We adhere to the fundraising standards and comply with the Governance Code.

We are committed to protecting your personal information and being transparent about what information we hold about you, whether you are a **visitor** to our website, a **newsletter**

recipient, a financial supporter, a volunteer or participant in one of our services, or a **prayer supporter**.

This policy explains how we collect and use the personal information you provide to us, whether this is online, in person or via phone, mobile, email, letter or other correspondence or printed form, and personal information about you that we may obtain from third parties.

If you use our websites or any of our services, or provide us with any personal information, we will bring this policy to your attention so that you are fully aware of how your information will be used and disclosed.

4.0 Our privacy policy in brief

It's important that you read the full policy to understand **what information we hold, how we may use it, and what your rights are** - but if you don't have time to read it all now, here's a quick summary:

- We collect information that is **personal data**. Personal data can be information that may be used to help identify an individual, such as name, address, phone number, email address, IP addresses or website pages accessed.
- We collect information about everyone who engages with Peacehaven Trust. This could be supporters, newsletter subscribers, donors, volunteers, employees or trustees.
- We collect information to provide services, to provide information, to fundraise for our work, to resource our activities and fulfil our charitable objectives and for administration. This information may also be used for analysis, and for the prevention or detection of crime.
- We only collect the information that we need or that you agree we can collect.
- We do our best to keep personal information secure wherever we collect personal data online.
- We never sell your data and we will never share it with another company or charity for their own purposes.
- We only share data where we are required by law or with carefully selected service providers who carry out work with us. We recognise the importance of ensuring that all our service providers treat your data as carefully as we would, use it only as instructed, and allow us to check that they do this.

These are the key points of the privacy policy. You will find the policy in full below, so you've got all the details you need.

This policy applies to the website we operate, our use of emails and postal mailings, and any other methods we use for collecting information. **It covers what we collect and why, what we do with the information, what we won't do with the information, and what rights you have.**

Who are we?

Peacehaven Trust CLG provides residential care services for adults with a range of disabilities. We aim to support each resident physically, emotionally and spiritually, while

respecting their dignity and unique individuality. Peacehaven Trust operates from a Christian ethos and respects the belief of all.

Peacehaven Trust's registered address is 1&2 Hillside, Greystones, Co. Wicklow, Republic of Ireland. A63 FN36

For further information about our privacy policy and data protection, please contact us by:

- emailing admin@peacehaventrust.com
- calling us on 01 9101338

What information do we collect? Where do we collect it from?

We will only ever collect the information we need - including data to help improve our services – or which you agree we can collect.

Personal data is any information that can be used to identify you. For example, it can include information such as your name, email address, postal address, telephone number, mobile telephone number, bank account details, and whether you are a taxpayer so that we can claim Gift Aid on any donations you may make. *[It also includes Internet Protocol (IP) addresses (the location of the computer on the internet), details of pages visited on websites and files downloaded – however Peacehaven Trust does not use 'cookies' and does not collect such IT based data.]*

We collect information in the following ways:

Information that you give us directly

We collect this information in connection with specific activities, for example, when you use our websites or printed forms or telephone our offices to:

- make a donation to us
- sign up for our email newsletters
- sign up for our mailed newsletters
- or otherwise provide us with personal information.

Please note: You don't have to disclose any of this information to browse our websites. However, if you choose to withhold requested information, we may not be able to provide you with certain services.

Information from third parties

We may receive information about you from third parties; for example for a friend making enquires on your behalf. If we receive information about you from third parties, we will provide you with details of whom we received upon request.

Information from public sources

We may combine information you provide to us with information available from public sources or records in order to gain a better understanding of our supporters and those who

engage with us. This helps us to improve our fundraising methods, resources and programmes. Such information may be found in places such as Companies House and information that has been published online and in print.

Sensitive/special categories of data

Data Protection law recognises that certain categories of personal information are more sensitive. This is known as **sensitive personal data** or **special categories** of data and covers **health information, race and ethnicity, religious or philosophical beliefs and political opinions** amongst other things.

We do not collect sensitive personal information about you unless there is a clear reason for doing so, such as involvement in an event where we need this information to ensure safeguarding, to carry out appropriate checks on volunteers, or care for participants. For some events we will collect health information so that staff have the relevant information to care for participants.

When we collect this information, we will make it clear to you what we are collecting and why and what are our legitimate interests or other legal grounds for processing this information.

How do we use personal data?

We may use the personal data that you provide in the following ways:

- to process any donation(s) we may receive from you, to claim Gift Aid on these donations and to update you on how your donations are being used
- to set up direct debits, standing orders and one-off card payments
- to provide you with information that you have requested about our work or our activities
- to provide you with information about other resources, events or programmes we offer that are similar to those you have already purchased or enquired about and to which you have not objected to receiving
- to communicate with supporters
- to record the contact that we have with you
- to provide you with information about Peacehaven Trust and how you can support our work as a charity (where you have consented to receiving this information as applicable)
- to invite you to participate in surveys or research
- for administration purposes, e.g. we may contact you about a donation you have made or event you have expressed an interest in or registered for
- for internal record keeping, such as the management of feedback or complaints
- to notify you about changes to our services
- to analyse and improve the services we offer
- to analyse the use of our websites and ensure their content is presented in the most effective manner for you and your device.

- to further our legitimate charitable aims such as sending you information about how donations are being used or sending you an annual report.

You can choose to receive Newsletters from Peacehaven Trust and in which format. If you would prefer not to receive, please email admin@peacehaventrust.com, write to us at 1&2 Hillside, Greystones, Co. Wicklow, Republic of Ireland. A63 FN36, or call us on **019101338**

Links to other websites

Peacehaven Trust does not link to other websites, including social media sites.

Do we sell or share personal information?

We never sell or share your personal information with other organisations to use for their own purposes.

Sensitive/special categories of data

If you provide us with sensitive/special categories of personal data including, but not limited to, your racial or ethnic origin, political opinions, religious or philosophical beliefs or your physical or mental health, we will only use this for the specific purpose for which you gave permission and where it is within our legitimate interests to process or where we have other legal grounds to do so.

What is our legal basis for processing data?

We rely on a variety of legal bases for processing data depending on the purpose of the activity being undertaken.

We use a **contractual basis** for sending data via newsletters.

We rely on **legitimate interests** for a variety of purposes. Legitimate interest is about balancing the interests of Peacehaven Trust against your rights and freedoms, and having due regard to your reasonable expectations about the use of your data. These purposes include:

- mailing Peacehaven Trust Newsletters and the Peacehaven Trust Prayer Diary and other information with your subscription
- mailing other information about Peacehaven Trust such as our annual Impact Report
- thanking (either by mail or telephone) those of you who have made a financial gift

You can let us know at any time if you would prefer not to receive these communications.

Every email newsletter you receive provides a clear opportunity for you to opt out of/unsubscribe from future email newsletters.

We use **compliance with a legal obligation** as the basis for processing any legally required activities such as Gift Aid returns to Revenue.

Who has access to your personal information for processing data and how do we keep it safe?

We maintain a high level of security in relation to the collection, storage and disclosure of your information. This is very important to us and we take all necessary steps to ensure that any information we hold about you is safe.

Storing your information

We place great importance on the security of all personal data associated with our subscribers, supporters and customers.

Information is stored by Peacehaven Trust in paper files at our offices, off-site and in the Cloud.

We have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control. For example, only authorised personnel are able to access personal information, we ensure access to information is password protected or secured via locked filing cabinets and we encrypt financial information you input before it is sent to us.

While we cannot ensure or guarantee that loss, misuse or alteration of data will not occur while it is under our control, we use our best efforts to try to prevent this.

Any sensitive or special categories of data you may provide to us are only shared on an absolute need to know basis, and are deleted after each relevant event unless we need to keep that information for a longer period e.g. for safeguarding reasons.

We enforce strict procedures and security features to protect your information and prevent unauthorised access, although we cannot completely guarantee the security of any information you transmit to us.

Transferring your information outside of Europe

Although most of the information we store and process stays within the Republic Of Ireland, some information may be transferred to countries outside the European Economic Area (EEA).

This may occur if, for example, if a parent company requests personal information; and their servers are stored in a country outside the EU or if we use a cloud IT platform where data is dispersed between a number of different servers. These countries may not have similar data protection laws to the EU. However, we will ensure that your privacy continues to be protected as outlined in this privacy policy and in accordance with our legal obligations under applicable data protection legislation.

By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

If you have engaged with us from outside the EEA, your information may also be processed by volunteers operating outside the EEA, for example if you engage with one of our programmes from a country outside the EEA and we pass your details to a national coordinator to provide you with advice and support.

Sharing your information

Peacehaven Trust does not sell or share any information about you to other organisations.

Peacehaven Trust may disclose your personal information only in the following circumstances:

- To third parties who provide a service to us and are our data processors. We employ other companies and individuals to perform functions on our behalf. Examples include data management systems. These data processors have access to personal information

needed to perform their functions, but may not use it for other purposes. We require these third parties to comply strictly with our instructions and data protection laws and will make sure that appropriate controls are in place.

- Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies), or in order to enforce or apply our rights (including in relation to our website or other applicable terms and conditions) or to protect Peacehaven Trust (for example in cases of suspected fraud or defamation).

How long do we keep your data for?

- We will hold your personal information on our systems for as long as is needed to fulfil the function for which we hold the data or as long as is required by law for the relevant activity. For example, Revenue requires us to keep a record of donations, Gift Aid and financial transactions for seven years.
- If you request that we stop sending you marketing or fundraising information, we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.
- Legacy income is important to the running of the charity. We may keep data you provide to us until 24 months after a legacy gift is received, or until we are notified that Peacehaven Trust is not a beneficiary from the estate, to carry out legacy administration and communicate effectively with the families of people leaving us legacies. This also enables us to identify and analyse the source of legacy income we receive.
- Where your information is no longer required we will ensure that it is disposed of in a secure manner.
- Information will only be kept as long as is necessary for the purposes for which you provided it or we obtained it and will be minimised to ensure we only keep what is necessary.

What are your rights?

We'd like to keep all who engage with Peacehaven Trust up to date with our progress. So, to update you on what we're doing and ask whether you are able to support us, we'd like to keep in touch with you (by post, phone, email, text and other electronic means) about our progress and how you can continue to help us in this important mission.

We will not use your information for marketing or fundraising purposes if you have asked us not to or we do not have your permission to use it for these purposes. (In certain circumstances we must obtain your permission before we contact you for marketing or fundraising purposes.) However, we will retain your basic details on a suppression list to help ensure that we do not continue to contact you.

If you are registered to receive one of our email newsletters, every email communication provides a clear opportunity for you to opt out of/unsubscribe from future email communications.

The Data Protection Act and the upcoming General Data Protection Regulation give you certain rights over your data and how we use it. You have the right to:

- request a copy of the information we hold about you and details of what we do with that information (known as a **subject access request**)
- update or amend the information we hold about you if it is wrong
- change your communication preferences at any time
- withdraw your consent to use of your personal information where we are relying on consent as the legal ground for processing it
- ask us to remove your personal information from our records
- ask us to restrict the processing of your personal information
- obtain a portable copy of certain personal information where this is processed automatically
- object to the processing of your information for marketing purposes or profiling
- raise a concern or complaint about the way in which your information is being used
- ask us to explain any automated processing or profiling we carry out and the impact of this on you

If you wish to exercise any of these rights, please contact us in writing at 1&2 Hillside, Greystones, Co. Wicklow, Republic of Ireland. A63 FN36 or by emailing admin@peacehaventrust.com. Some of these rights are not available until 25 May 2018 - if this is the case, we will let you know that when you contact us.

If we are not sure who you are, we may ask for reasonable proof of your identity before providing you with information or carrying out any of the above actions.

Complaints, compliments or comments

If you are unhappy with our work or something that we have done or failed to do, we want to know about it. We also welcome your views on what we do well. Your comments enable us as an organisation to learn and continuously improve our services. You can get in touch with the Director of Services at 1&2 Hillside, Greystones, Co. Wicklow, Republic of Ireland. A63 FN36 or by e-mailing michaelwilliams@peacehaventrust.com.

If you wish to raise a data protection concern or complaint with a supervisory body, you can address a complaint to the Data Protection Commissioner's Office. For more information, visit www.dataprotection.ie

Changes to the Privacy Policy

We keep this policy under regular review. If we make any significant changes in the way we treat your personal information, we will make this clear on our websites or by contacting you directly.

Details of the sections of the policy that have been changed will be noted here.

You do not have to agree to any changes if these are not compatible with the initial purposes for which you provided or we collected your data.