



Title	Privacy Policy
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PRIVACY POLICY

At Cuan Mhuire we're committed to protecting your privacy and personal information, which is why we want to be completely transparent about why we need the personal information we request and how we will use it. This is our privacy policy.

Developing a better understanding of service user and supporter needs through personal information allows us to make better decisions, communicate more efficiently and ultimately helps us to reach our vision – 'Restoring Hope', Cuan Mhuire sees the goodness in everyone who comes to our centres and supports them on their journey from addiction to hope.

In this policy we use the term personal information to mean any information you give us from which you can be identified. This might include your name, your home address, your personal email contact details, or your telephone number. Personal information does not include information where your identity has been removed (ie anonymous data).

We're totally committed to protecting your information and using it responsibly. Please read our policy carefully to understand how we collect, use, and store your information.

The processing of your information is carried out by or on behalf of Cuan Mhuire CLG (CRA 20012724), a registered charity in Ireland and Cuan Mhuire NI (Charity No: 105761) Northern Ireland. We are listed on the Information Commissioner's register of data controllers under Registration Number ZA023421

When we refer to "we" or "us" in this policy we are referring to the Cuan Mhuire group of companies:

Cuan Mhuire CLG (20012724)

Cuan Mhuire NI (105761)

If you have any questions about this privacy policy and how we use your information you can contact us at:

Cuan Mhuire Athy, Milltown, Athy, Co. Kildare +353 59 863 1493 E: athy@cuanmhuire.ie

Cuan Mhuire Newry, 20 Dublin Road, Newry, Co. Down +44 283 0849714 E: newry@cuanmhuire.ie

Where we collect information about you from?

We collect information about you in the following ways:

DIRECTLY – When you provide the information to us.

You may give us your information in order to access any of our services, make a donation, sign up to an event, purchase from our shop or when you need to communicate with us. Sometimes when you support us, your information is collected by an organisation working on our behalf (eg a professional fundraising agency), but they will only process your personal information in line with our instructions and we are responsible for your information at all times.

If you give us information to access our services – Residential Treatment Centres We never share this information with other organisations without your consent, such as making a referral on to another agency or to a charity providing specialist services.

INDIRECTLY – When you give permission to other organisations to share it with us.

Your information may be shared with us by independent event organisers, for example Organised Marathons or fundraising sites like Enthuse, JustGiving or idonate. These independent third parties will only do so when you have indicated that you wish to support Cuan Mhuire with your consent.

You should check their Privacy Policy to understand fully how they will process your information. We may also obtain information about you from a family member or a friend who contacts us on your behalf or if a fundraiser passes on your details to us.

AVAILABLE PUBLICLY – When your information is available in the public domain.

We may combine information that we already have about you with information available publicly or information available from external sources in order to gain a better understanding of you and to improve our fundraising methods, products and services (see section 3 below for more information).

We also use publicly available information to identify individuals who may be interested in giving major gifts to charities or organisations like Cuan Mhuire.

Why we use your information?

We will only use your information where we have a legal basis to do so and will always respect your rights.

Where we use your information, it may be because you have consented to us doing so or because we consider we have a legitimate interest to do so. Where we do rely on a legitimate interest to use your information, we will always ensure that this is done in a fair way that respects your rights.

Other reasons may include using information because we have a legal obligation to do so or because we must fulfil contractual obligations.

We only use your information:

- If you have given us your consent to use the information for a specified purpose, such as sending marketing communications to you by email.
- If you have given us your consent to provide a service to you, a family member or close friend and you are their chosen contact person whilst providing residential support and after-care relevant to your needs.
- Where it is necessary for us to comply with a legal obligation, for example to claim Gift Aid on a donation.
- Where it is necessary to enter into, or perform, a contract with you, such as when you apply for a job with us.
- For our own (or a third party's) legitimate interests, provided your rights don't override these interests, for example fundraising, internal record keeping, research and reporting.

How we use your information to fulfil your requests and support you

3.1 To respond too or fulfil any requests, complaints or queries you make to us.

If you contact us directly, we will use the information you give to us to handle your enquiry or request. This may include sharing your details with other Cuan Mhuire personnel in order to process your enquiry, responding to your query or feedback, or sending you relevant information such as fundraising materials or information on addiction related topics.

We may also keep a record of conversations we have with you, feedback you provide and any marketing materials we send out to you. We use this information to compile internal reports to help us improve our services and to handle queries more efficiently.

3.2 To process any donations you make, claim any relevant Gift Aid and maintain a record of your past or potential future financial contributions.

We will send information and support to you by post, phone, mobile messaging, email, social media, or any other channels for which you have provided your details. When you have asked for details of an event, we will send you information including, where relevant, ideas for fundraising and reminders on key information about the activity.

Where appropriate, we will use the information you provide to identify any help we can offer, specific to the activity you have signed up for and to provide necessary information to event organisers. Where this includes information about your health or other sensitive information, we will only use this information if you have consented to us doing so.

We may also receive information through event organisers or through third party websites such as Enthuse, JustGiving or idonate so we know you are fundraising for us.

If you have completed a consent form to access one of our treatment centres, we will send you information relevant to your assessed needs, and our workers will agree with you the methods you wish to be contacted by such as phone, text, email.

3.4 To manage our recruitment.

When applying for a role with Cuan Mhuire either directly with us or through a recruitment agency the personal data you provide as part of the recruitment process will only be held and

processed for the purpose of the selection processes and in connection with any subsequent employment unless otherwise indicated. You will be asked to provide certain information including your name, contact details, employment history and qualifications. This information is mandatory in order to consider your application, communicate with you about your application and where successful, follow up with references or meet our statutory and internal monitoring and reporting responsibilities. We may also view social media profiles of applicants, such as LinkedIn, to the extent that it is relevant to your application.

Unsuccessful applicants' data will be held confidentially within the recruitment system for a period of two years before it is deleted in order that you can access and re-use data in future applications and we can respond to statutory reporting requests.

How we use your information to tell you about our work

4.1 To send you marketing communications by email, mobile messaging, or direct message on social media, where you have agreed to receive this.

Where you have provided an email, mobile phone number, or details of your social media profiles and consented to being contacted in this way, we will send you information by those channels – including by direct message through social media – covering ways to give or raise money for us, to campaign for us and to volunteer for us.

4.2 To contact you by phone and post.

Where it is appropriate and relevant, and you have provided us with a telephone number or a postal address, we will occasionally call or write to you to tell you about ways to give or raise money for us, to campaign for us and to volunteer for us. We do this as we consider it is a legitimate interest to promote our charitable cause and communicate with you about ways you can support us.

We will not contact you by phone for marketing purposes if your number is registered with the Telephone Preference Service, unless you have agreed to receive calls from us.

4.3 To manage your contact preferences.

You can tell us to stop contacting you, or change the way in which we do so, by getting in touch with us – call +353 59 863 1493 / +22 28 3084 9010 or email us. We will keep a record of any requests to stop receiving marketing from us to ensure that we do not communicate with you in the future, unless you tell us you want to hear from us again.

4.4 To make sure we speak to you in way that is relevant to you, and to understand our supporters more broadly. We try to ensure that our communications are as effective as possible so that we make the best use of the money we spend on them. This means communicating with people in different ways, appropriate to them.

On occasion, we will use information about how you have interacted with us previously, for example the record of your previous donations to us and the type of activity you have been involved with, to tailor our communications with you about future activities. We will also use information about how you use our website or interact with our emails so we can make them more effective. For example, we use the third-party provider Google Analytics to gather this information.

In certain circumstances we will use information about you from publicly available sources such as online registries, websites, media or social media, or personal introductions in order to understand more about your interests and preferences so that we can better tailor our communications – telling you about the things you are likely to be interested in or letting you know of ways to fundraise with us which is relevant to you. We may do this by looking up such information as your career information, peer networks, listed directorships, demographic information, ability to donate, interests or other information.

External data sources include publicly available information such as Companies House, Charity Commission, Charity Regulator and other charity registers, Electoral Roll, reputable newspaper articles, publications, company websites and biographies on professional networking sites as well as geographic and demographic information based on your postcode. This allows us to segment our database and gives us a better understanding of our supporters.

It also helps us to make appropriate requests to supporters who may be able and willing to give more than they already do. Importantly, it enables us to raise more funds, sooner, and more cost-effectively, than we otherwise would.

We will analyse data from our database so that we can understand our residents and supporters, for example, where they are located, age, sex, if they completed our programme or not.

4.5 To target our digital and social media marketing.

On occasion, we will use the information you provide us to target our digital and social media advertising effectively. This could include securely providing contact details such as your name and email address to digital advertising networks or social media companies such as LinkedIn, Instagram, Facebook, Google, SnapChat and Twitter. For example, we may use your information to enable us to display adverts to you, or to potential supporters who have similar characteristics to you.

Any information we share with social media companies will be shared in an encrypted format and will not be used for their own purposes. You can stop your information being used for this by contacting us.

Where you have asked us not to use your information for targeted digital advertising, you may still see adverts related to Cuan Mhuire. This is because the social media site or advertising network may select you based on information they hold, such as your age and location, or websites you have visited, without using information that has been provided by us.

You can control the kind of advertising which you see through the relevant social media site:

[Facebook](#)

[LinkedIn](#)

[Twitter](#)

4.6 Use of any images, videos of, or other information you tell us about something you have done for Cuan Mhuire.

If you share information about the fundraising or campaigning activities you have done for us, or your personal experiences, by post, email or over social media, we may want to use this to help us promote our events and activities in the future. We will obtain the necessary consent to use this information.

What we do if you chose to tell us about your experience of addiction

Where you have provided information about your experience of addiction, including through a survey, focus group, questionnaire, or when we are talking to you by phone, email, or in person we will explain what the information will be used for and whether it will be held anonymously or not.

If the information will be held in a way that could be connected to you personally, we will ask your consent to store and use what you tell us.

We will use this information for the purposes explained to you at the time of collection. For example, to better understand the issues that are important to our supporters which helps shape our communications and activities. We may compare statistics related to our supporters to information about the general population, to help our understanding.

Where you provide more detailed information, we may want to use this in our communications including PR and media activity, digital and social media, campaigning, fundraising materials and internal communications, to help us raise awareness of addiction and the issues effecting our residents and their families.

We would never use your story without obtaining your consent first. If a suitable opportunity arises for us to use the information you have given us we will contact you to discuss the use of your story in further detail. We will fully explain how we would like to use your information, and get in touch with you each time we would like to use it outside of the organisation, so that we may obtain your fully informed consent.

Sharing Your information with other organisations

We will never share your information with third parties for their own purposes, unless this is explained to you at the time, we collect your information, and you give us your consent to:

- Sharing information with regulators to protect our rights, property and safety, or the rights, property and safety of others; or We are legally required to do so. For example, we are legally required to provide your data to HMRC if you have agreed to us claiming Gift Aid on your behalf.
- Sharing your personal information with other entities in our group if we are satisfied that we have a legitimate business interest to do so or, if you have given your consent to the sharing.

We also use suppliers known as 'data processors' to process your personal information on our behalf, for example, to send out mailings or processing payments. When enlisting the services of such suppliers we ensure that they are under a contractual obligation to only use your information in accordance with our instructions and for no other purposes.

Sometimes organisations who work on our behalf may manage information outside the European Economic Area (EEA). In those circumstances, we will make sure that adequate levels of privacy protection, in line with ROI/UK data protection law, are in place. These safeguards will usually be contractual and/or the result of a European Union decision which allows the transfer (such as a US organisation that is certified under the EU-US Privacy Shield Framework).

How Long to keep your information

We will hold your information for only as long as is necessary from the end of your relationship with the charity in accordance with our data retention policy. In some circumstances, this will be shorter. For example, information related to unsuccessful job applications is destroyed after one year. In some circumstances, this will be longer, for example, pension information of former employees. If you would like to know how long we will hold any specific information, then please contact us and we can provide further details.

Your rights

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). If you want to access your information, send a description of the information you want to see and proof of your identity by post to Supporter Services, Cuan Mhuire Athy, Milltown, Athy, Co.Kildare or Cuan Mhuire Newry, 200 Dublin Road, Newry, Co.Down, BT35 8RL. We do not accept these requests by email so we can ensure that we only provide personal data to the right person.
- Ask us to correct personal information that we hold about you, which is incorrect, incomplete or inaccurate.
- Ask us to erase your personal information from our files and systems where there is no good reason for us continuing to hold it.
- Object to us using your personal information to further our legitimate interests (or those of a third party) or where we are using your personal information for direct marketing purposes.
- Ask us to restrict or suspend the use of your personal information, for example, if you want us to establish its accuracy or our reasons for using it.
- Ask us to transfer your personal information to another person or organisation.

Call us on +353 59 863 1493, +44 28 3084 9010 or email us if you have any concerns.

If you have given your consent to us processing your personal information, you have the right to withdraw your consent at any time. To withdraw your consent, please contact us. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information and, subject to our retention policy, we will dispose of your data securely. If you have any questions please email us, and for further information see link below.

You have the right to make a complaint at any time to the [ICO Dublin](#) or [ICO UK](#) the supervisory authority for data protection issues.

How Cuan Mhuire will exercise your right to erasure (right to be forgotten)

Want Cuan Mhuire to exercise your ‘Right to be Forgotten’? Here are your options:

- Can you stop getting in touch trying to sell me stuff?
 - Yes, we can suppress your supporter record, which means that we’ll know not to send you any marketing communications from now on. Your details will stay on our database, though, so if you would like to support us in future, you’ll still be able to do that.
- I don’t want you to keep my details. Can you delete my supporter record?

- If you've never made a donation to us, we can delete your supporter record off our database.
- But I've donated to you in the last year. Can you reduce the amount of data you hold on me?
 - Because of the Companies Act/Charities Act/Data Protection Act, we can't legally delete your supporter record for six years from the last financial year you donated to us, for audit purposes. We can limit the amount of data we have to the following, though:
 - Initial and last name
 - House number/name and postcode
 - To flag, if we do this you won't be able to continue your regular donations to us, and we won't be able to claim Gift Aid.
- Actually, I want to be completely anonymous. Can you do that?
 - Yes we can. If you haven't supported us financially in the last six years, we can anonymise you (don't worry, it's a lot less scary than it sounds). This means we'll remove all identifiable information we have on you, so name, surname, full address, email and any numbers. We'll also get rid of any record of conversations you've had with us, and any relationships you have with other supporters or groups.

How Cuan Mhuire will exercise your right to erasure (right to be forgotten)

We may update this policy to reflect changes in how we use your information. You may wish to check this policy each time you provide Cuan Mhuire with your information. Where appropriate, we will provide you with notice of any significant changes to how we use your information.

Other Policies that may be of interest to you re data handling:

Standard Policy No:	Standard Policy Title
18.13	Creation, Management, Handling, Secure Storage, Transportation, and Destruction of Records
15.3(a), 15.8, 15.15, 15.16, 15.17, 15.20, 15.31, 15.32, 15.33	Data Protection Policy
15.1, 15.2, 15.11	Data Breach Notification Policy & Procedure
15.4, 15.6, 15.9	Information Governance and Technology Strategy and Supporting Policies and Procedures
15.3(a), 15.8, 15.15, 15.16, 15.17, 15.20, 15.31. 15.32, 15.33	Data Protection and GDPR
15.16	Confidentiality Policy
15.18	Freedom of Information Policy and Associated Procedures
15.16	Procedure for Transferring Information