

## **PRIVACY NOTICE**

#### 1. Introduction

The Children's Grief Centre is a support service for school-aged children and young people affected through death, separation and divorce.

It provides a safe supportive service for children and young people and their families who are grieving. The service is provided by trained and experienced people.

We are a registered charity, bearing the charity number CHY22832 / registered charity number 20205877.

The Children's Grief Centre is committed to protecting the privacy of users of our website and data subjects and others who attend our service, in compliance with the Data Protection Acts.

This privacy notice details how we collect your data, what we do with your data, what we don't do with your data and how you can access your rights as a data subject or seek further information when you interact or use our website and/or support services. Our website contains external links to other websites. The Children's Grief Centre is not responsible for the privacy policies of external websites.

# 2. Definition – Personal Data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

### 3. Queries & Complaints

If you require further information about the way your personal data will be used, or if you are unhappy with the way we have handled your personal data, and wish to contact us please submit your concerns to:

Data Protection Officer, Children's Grief Centre, Ashbourne Avenue, South Circular Road, Limerick, Tel: 087 985 1733 / 061 224727, Email: <a href="mailto:reception@childrensgriefcentre.ie">reception@childrensgriefcentre.ie</a>.

You have the right to lodge a complaint with the Office of the Data Protection Commissioner. To contact the Office of the Data Protection Commissioner, please use the following details:

Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28. Tel: +353 (0)761 104 8000, / +353 (0)57 868 4800. Contact web forms are also available at <a href="https://www.dataprotection.ie">www.dataprotection.ie</a>

### 4. How do we collect data?

We collect your data when you contact either directly or via our website, attend an appointment at our centre, when you donate to our service or attend one of our fundraising events.

#### 5. What data is collected?

We collect data from our website if you complete the contact form, send us an email or make a donation. We collect data from you when you come to us for support services. We process and store personal information so that we can offer support services and pursue fundraising activities so that we can fund these services.

## 5.1 What data do we collect when you visit our website?

You have the opportunity to send us information via our website; childrensgriefcentre.ie, such as through the "contact us" pages or any other area where you may send emails or provide feedback. By choosing to contact via our website you might provide us with some personal information. This information can include;

- Personal information (such as name, date of birth, email, telephone, address)
- Other contact information you provide on our online form
- Donation by debit / credit card (name, address, email)

If you donate through our website, you will enter your debit/credit card details through Stripe. Card details are not seen or stored by The Children's Grief Centre but are passed securely to Stripe by you so that they can process your donation which is then lodged to our bank. We use this provider as they have automatic fraud screening to protect donors' information and they are PCI compliant.

#### 5.2 Cookies

The Children's Grief Centre respects the privacy of all visitors to our websites. Our website employs cookies in order to operate effectively, more information on how our website uses cookies can be found at https://www.childrensgriefcentre.ie/cookie-policy/

# 5.3 What data do we collect when you attend our support service?

When you attend an appointment to meet with one of our Support Staff you are choosing to participate in a relevant support activity which we intend will be of benefit to you and your family. In this instance the types of data we will collect include the following;

- Personal Information (such as names, dates of birth, family composition, contact information and emergency contact details)
- Sensitive Information (such as health / medical information, name of GP, additional support needs)
- Attendance details (such as appointment times)
- Development information (such as observations made by our support staff and artwork)

Location of collection	Reason	Type of data collected	
Website	Personal identity	Name	
	Contact details	Address, email, tel number	
	Donations	Debit/credit card details recorded by Stripe, name, email	
When using our support service	Personal identity	Child	Name, DOB, family composition, health information, GP details
		Parent / Legal guardian	Name, family composition,
	Contact details	Child	Name, name of parent/legal guardian, home address, tel number & email for parent / legal guardian, emergency contact info
		Parent / legal guardian	Name, name of child, home address, tel number & email
	Provision of support service	Child	Attendance records, development progress work, artwork, support needs if any

#### 6. What do we use your data for?

The purpose of collecting your email via our website is so we can contact you regarding any questions you may have asked, or to provide you with other information that may be relevant to you.

The purpose of which debit/credit card details is collected is to process your online donation. The purpose of collecting data from you while availing of our support services is to verify your identity, to provide you with the support service which you have come to us for, monitor your progress and for administrative purposes. We also work to ensure the wellbeing of all children and young people while monitoring their progress while they work through this support process.

#### 7. What is our legal basis for collecting this data?

Our use of your personal data will always have a lawful basis. We seek consent (i.e. your agreement) to process personal data. We seek consent from parents / legal guardians so that you and your child can engage with our support service. You can withdraw your consent at any time by contacting us at the address listed in the 'queries and consent' section of this privacy notice.

We also use the following lawful basis to process personal data.

- Vital interest where we need to protect the vital interest of you or another person (e.g. processing of parent / guardian data to protect the vital interests of a child).
- Legal obligation (e.g. processing of personal data and financial information should you wish to donate to the service via our website, or where we are legally obliged to inform relevant services if we feel there is a concern for the safety of a child).
- Legitimate interest of the Children's Grief Centre We will only use this lawful basis if no other lawful basis applies, and as long as it does not interfere with your fundamental rights and freedoms.

Some personal information is treated as more sensitive (i.e. special categories of data – data concerning health). To process special categories of personal data lawfully, we must identify a lawful basis and meet a separate condition for processing this data.

### 8. Who do we share the data with?

We do not rent or sell your personal information to anyone. We do not share sensitive personal data with any third parties however should we need to do so, we will only share this data once we have obtained your consent, unless we are legally required to do otherwise.

## 8.1When making an online donation

Where you make a donation through Stripe, they share limited data with us in order to process the donation. In such instances Stripe are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf.

## 8.2 When sharing data with a parent/legal guardian

The Children's Grief Centre, when providing support services, makes every effort to ensure that the data about the child is treated in strictest confidence. There may be occasions where data needs to be shared with a parent or guardian. Where appropriate this will be explained to the child prior to any disclosure.

## 9. How long do we retain data?

The Children's Grief Centre will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary. The Children's Grief Centre is required to retain information in accordance with the law. How long certain kinds of personal data should be kept may also be governed by specific sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual needs. The Children's Grief Centre sets out its recommended retention periods in its Record Management Policy.

## 10. What are your rights?

You have a number of rights when it comes to your personal data. When we receive a valid request from you to invoke one of these rights, we will do our best to adhere to your request as promptly and reasonably as possible, however restrictions may apply in certain circumstances. Please contact us at the address/contact details listed in the 'queries & complaints – section 3 of this notice' for details on how to access your rights.

Your rights under articles 15-21 under GDPR include right of access to your personal data, rectification, erasure, restriction, data portability, right to object and right not to be subject to automated decision making, including profiling.

#### 11. Changes to this Privacy Notice

We reserve the right to modify this Privacy Notice at any time. Each time you use our website or our support service you shall be bound by the then current Privacy Notice and accordingly you should review the Privacy Notice each time you use our website or support service.

This privacy notice was last updated in February 2020.