

External Privacy Notice

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Approvals

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External Privacy Notice

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1. Introduction

Welcome to Let's Grow Together! Infant & Childhood Partnerships CLG (Let's Grow Together, "The Organisation", "we", "our" or "us"). This Privacy Notice explains how we handle and use your personal information, who we share it with, and your rights in relation to that information. Under the General Data Protection Regulation (GDPR) of May 2018, Let's Grow Together is the controller of that information. Let's Grow Together is committed to protecting and respecting your privacy.

Please read the following carefully. You are welcome to ask us any questions or for more information at any time.

The Organisation is the controller in relation to the processing activities described below which means that we decide why and how your personal information is processed.

This policy was last updated on the date that appears at the bottom of this page.

2. Personal Information We Collect About You

We collect personal information about you and your family that you give to us and that we obtain from partner organisations that provide services to you and/or your family. We only collect personal information which we need and that is relevant for the purposes for which we intend to use it.

Depending on the services and programmes you receive from us, information that we may collect about you and/or your family includes:

- Your name and contact details (email address, telephone number, postal address)
- Demographic information (including but not limited to: education and employment information, housing information, ethnicity, etc)
- Your child(ren)'s name, gender, and date of birth
- Medical, health, and/or behavioural information about your child(ren)
- Relevant family information that you provide or is observed while receiving our services
- Records of our programmes and services that you receive and notes about what you did in them
- Notes about you and/or your child(ren) from partner organisations that you receive services from, in relation to services you receive from us
- Feedback that you provide on our feedback forms
- Text messages, WhatsApp messages, and/or voice notes that you send us
- Information that you provide through our social media
- Photographs with your consent
- Your identification information when exercising the rights that you have in relation to our processing of your personal information (see further Your Rights in Relation to Your Personal Information)
- Footage of you on CCTV

3. Use of Your Personal Information

We use your personal information for a variety of reasons. We rely on different legal grounds to process your personal information, depending on the purposes of our use and the risks to your privacy. You may withdraw your consent for us to use your information in any of these

ways at any time. Please see the 'Your Rights in Relation to Your Personal Information' section below for further details.

We may use and process your personal information for the following purposes:

- To contact you about our service and programmes
- To register you for our service or programmes
- To register your child(ren) for Dolly Parton's Imagination Library
- To determine your eligibility to join our service
- To provide services or programmes to you and your family
- To become more informed in relation to your/your family's healthcare and support needs
- For quality assessment, monitoring, and/or evaluation of our service and programmes
- To handle complaints or respond to general queries
- For research purposes that are approved through our Research Application Process
- For national ABC Programme data analysis

We rely on the following legal bases for processing your personal data:

- Where we have received your explicit consent as per our consent forms
- To fulfil or comply with a contractual or legal obligation
- To protect your or another person's vital interests

4. Disclosure of Your Personal Information by Us (Data Sharing)

Personal information collected by us is stored and used confidentially and securely. We do not sell your personal information to third parties. We only share your personal information with third parties with your consent for the following reasons:

- To work with another service provider or agency to provide services to you and your family
 - We may share relevant information with other agencies or service providers who are also working with you and/or your family
- To register your child(ren) for Dolly Parton's Imagination Library
 - We share your child(ren)'s registration information with The Dollywood Foundation Inc. to register them with the programme
- To assist with Child Protection
 - If there are concerns about your child's safety or welfare (including physical harm, emotional harm, neglect, or sexual abuse) we share relevant information and cooperate with agencies such as Tusla or the Gardaí
- To report to funding agencies
 - We report anonymous information on a regular basis to our funders, such as how many people are in our programmes and some responses to our feedback questions
- For analysis with the national ABC Programme
 - We share anonymous information collected on our Demographic Form, some of our outcome measures, and some of our feedback questions with the Childhood Development Initiative in Dublin (they are one of our ABC Programme partners, and they do the national data analysis of the ABC Programmes)

- For research purposes
 - We may share anonymous information with a researcher to do a specific research project, after they have received approval through our Research Approval Process
- For the purposes of co-operation with regulatory authorities/reporting
 - In certain circumstances, we must cooperate with and assist regulatory authorities/funding bodies in Ireland. We may provide personal data to agencies such as the Health Service Executive (HSE). When this happens, however, we generally try to do so on an anonymised basis.

5. Transfers of Your Personal Information Outside of Europe

Except for registration information for Dolly Parton’s Imagination Library, we do not transfer your personal information outside of Europe. All information you provide to us is stored on our secure servers which are located within the European Economic Area (EEA).

If at any time we transfer your personal information to, or store it in, countries located outside of the EEA (for example, if our hosting services provider changes) we will amend this policy and notify you of the changes. We will also ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law. This is because some countries outside of the EEA do not have adequate data protection laws equivalent to those in the EEA. Where they apply to our data transfer activities, we may rely on adequacy decisions by the European Commission about certain countries for data transfers to countries outside the EEA.

Registration information for Dolly Parton’s Imagination Library is inputted into the book ordering system of The Dollywood Foundation Inc. Once the information is sent, The Dollywood Foundation becomes the data controller, and their own data protection policies are in effect. This information includes child’s name, date of birth, address, sex, parent contact number and email address.

6. Security Using Online Communication

We take the security of your personal information seriously and use a variety of measures based on good practice to keep it secure. Nonetheless, sharing personal information over the internet (such as by using our online registration, demographics or feedback forms, or through our social media) may not be completely secure, so please exercise caution. When accessing links to other websites, their privacy policies, not ours, will apply to your personal information. Although we will do everything possible to protect your personal information, we cannot guarantee the security of any personal information during its transmission to us online. You accept the inherent security implications of using the internet and will not hold us responsible for any breach of security unless we are at fault.

If you are using a computer or terminal in a public location, we recommend that you always log out and close the website browser when you complete an online session for your security.

7. The Periods for Which We Retain Your Personal Information

We are obliged to retain certain information to provide services, ensure accuracy, to help maintain quality of service, and for legal, regulatory, fraud prevention and legitimate business purposes.

Information will be retained for no longer than is necessary for the purpose for which it was obtained by us or as required or permitted for legal, regulatory, fraud prevention and legitimate business purposes. We will not hold your personal information in an identifiable format for any longer than is necessary for the purposes for which we collected it.

See the Retention Register – Data Retention Schedule at the end of this document for the length of time each type of information is stored for.

8. Your Rights in Relation to Your Personal Information

You have certain rights in relation to your personal data and we have processes in place to enable you to exercise these rights.

Contact our Data Protection Officer Jessie Shea, at jessie@letsgrowtogether.ie or 086 031 6109, if you want more information or to exercise any of your following rights. You will need to verify your identity to exercise any of these rights, to ensure all personal information is kept secure and confidential.

8.1 Right of Access

You have the right to access a copy of any personal information we process about you. This is known as a Data Subject Access Request (DSAR). If you want to know if we are processing personal data relating to you and to have access to any such personal data you can contact us.

You have the right to access any personal information that Let's Grow Together processes about you and to request information about:

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

8.2 Right to Rectification

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

If you believe that we hold inaccurate personal data about you, you can update this information by contacting us. Depending on the type of personal data you believe is inaccurate, we may ask you for further proof to ensure that the personal data is being corrected properly. If we are satisfied that the personal data is inaccurate, we will make the necessary changes.

8.3 Right to Erasure

You have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws. However, this right does not apply where we have to comply with a legal obligation or where we need personal data for the establishment, exercise or defence of legal claims.

8.4 Right to Restriction

You have a right to request that processing of personal data is restricted in certain circumstances. However, we shall still continue to process the personal data for storage purposes, for the establishment, exercise, or defence of legal claims, or with your consent.

8.5 Right to Object

Where we are relying on legitimate interests as a legal basis to process your data, you have a right to object to such processing on grounds relating to your particular situation.

8.6 Right to Withdraw Consent

You have the right to withdraw your consent for us to store and process your personal information. You have the right to withdraw consent for all or specific activities, as described in our Consent Form. However, we shall still continue to process the personal data for storage purposes, for the establishment, exercise, or defence of legal claims, or with your consent.

8.7 Right to Portability

In certain circumstances, you can request that we provide to you your personal data in a commonly used format.

8.8 Right to Complain to the Supervisory Authority

You have the right to lodge a complaint with the Irish supervisory authority, the Data Protection Commission. You can find their full details on their website, <https://www.dataprotection.ie/en>.

8.9 Right to be Informed

You have the right to be informed regarding all our processing activities that involve your personal data. We provide this information through this Privacy Notice and our Consent Form. We also have a Data Protection Policy & Procedures document that you may request to see. You can contact us if you would like more information or have any questions. You are welcome to ask questions at any time.

9. Review

This Policy will be reviewed biennially, or earlier as new information and/or legislation requires.

Contact Information

You may contact us at any time if you have questions about this Privacy Policy or for any other reason by post, email, or phone.

Post: Let's Grow Together! Infant & Childhood Partnerships CLG, Drum Building Complex, Foyle Ave, Knocknaheeny, Cork, T23 KHE0

Email: admin@letsgrowtogether.ie

Phone: 021 601 0656

You may also contact our Data Protection Officer at any time.

Name: Jessie Shea

Email: jessie@letsgrowtogether.ie

Phone: 086 031 6109

Retention Register – Data Retention Schedule

RECORD TYPE	REASON FOR COLLECTION AND RETENTION	RETENTION PERIOD	ACTION AT END OF RETENTION PERIOD
Information in individual family file (including contact details and demographic information)	To provide services, monitoring and evaluation	7 years after the family closes with Let's Grow Together	Delete securely
Information in individual family file if it includes any information relating to Child Protection and Safety * supersedes retention period of individual family file	To provide services	14 years after the family closes with Let's Grow Together	Delete securely
Information on practitioner or professional (including contact details and demographic information)	To provide services, monitoring and evaluation	7 years after the practitioner or professional stops working in the catchment area	Delete securely
Anonymised and collated family demographic information	Monitoring and evaluation	Indefinite	-
Anonymised and collated practitioner or professional demographic information	Monitoring and evaluation	Indefinite	-
Data specifically collected as part of an approved research project	To participate in the research project	Defined per project, as approved by our Research Approval Process	Delete securely
Kidscope information and records	To provide services	Until the patient's 25th birthday, or eight years after their death	Delete electronic records securely and confidentially shred paper records
Employee employment details	Legal obligation	3 years after the employee resigns	Delete securely
Company financial information	Legal obligation	6 years after the year the information relates to	Delete securely
Information collected during employment application process	Legal obligation	1 year after close of employment post fulfilment	Delete securely