

Organisation:	Tearfund Ireland
Subject:	Data Protection, Privacy & Cookies Policy
Version:	1
Department(s) concerned:	All
Prepared by:	Data Protection Officer
Reviewed by:	Chief Executive Officer and Board of Directors
Approved by:	Board of Directors
Approval date:	September, 2018
Implementation date:	September, 2018
Next review date:	1 st August, 2020

Tearfund Ireland

Data Protection, Privacy & Cookies Policy

Disclaimer: This document does not represent legal advice or purport to be a legal interpretation of legislation or regulations. While every effort has been taken in the preparation of this document, Tearfund Ireland can assume no responsibility for and give no guarantees, undertakings or warranties concerning the accuracy, completeness or up-to-date nature of the information provided and does not accept any liability whatsoever arising from any errors or omissions. Appropriate professional advice should be taken before acting or refraining to act on the basis of this document.

Data Protection, Privacy & Cookies Policy

Table of Contents

Data Protection, Privacy & Cookies Policy	3
1. Data Protection	4
2. What Information We Collect and How?	4
2.1 Information that you give us directly.....	4
2.2 Publicly Available Information	5
2.3 Information we gather from our website cookies.....	5
3. Sensitive Information.....	5
4. Debit and credit card information	5
5. Control and access to your personal information	5
6. Data Sharing.....	6
7. How your Personal Information is utilised.....	6
7.1 Volunteering opportunities.....	6
7.2 Delivery of core charitable services	7
7.3 Fundraising, campaigning and marketing.....	7
7.4 Operational purposes	7
7.5 Analysis and market segmentation.....	7
7.6 Profiling	7
8. Lawfully processing your data	8
8.1 Consent	8
8.2 Necessity for performance of a contract	8
8.3 Legitimate interests	8
8.4 Legal obligation	9
9. Access and data security.....	10
10. Data Retention.....	10
11. Cookies and tracking.....	10
12. What We Don't Do.....	11
13. Anti-spam policy	11
14. Changes to our privacy policy	11
15. Site Information	11
16. Data Breach and Complaints Procedure.....	12
17. Jurisdiction and Governing Law	12
18. Privacy Policy.....	12

Data Protection, Privacy & Cookies Policy

Tearfund Ireland are Christians passionate about the local church bringing justice, transforming lives and overcoming global poverty.

We are committed to respecting and protecting your data and privacy. Maintaining the trust and confidence of our supporters, including visitors to our website is important to us. We will never share or sell your personal data with other organisations for their own marketing purposes.

This Data Protection, Privacy & Cookies Policy has been updated to reflect the General Data Protection Regulation (GDPR). Please read it carefully, together with any other information referred to in this policy. It details how Tearfund Ireland collects, uses and stores your personal information.

This Data Protection, Privacy & Cookies Policy will be reviewed periodically and may change in the future. We invite you to check occasionally to see if we have made any changes. By using this site, you agree to the Terms and Conditions of our policy.

If you have any questions about this policy or about your personal data with Tearfund Ireland, please email or write to:

The Data Protection Officer

Tearfund Ireland
2nd Floor
Ulysses House
22-24 Foley Street
Dublin 1
D01 W2T2

Email: dataprotection@tearfund.ie

Telephone: +353 (1) 878 3200

Our Data Protection Officer is Libby Sweetman.

1. Data Protection

Tearfund Ireland takes data protection very seriously. We are committed to operating in compliance with the Data Protection Act 2018 and advice and guidelines issued by the Data Protection Commissioner. The following links which we have also consulted, may be useful reference for you.

<https://www.oireachtas.ie/en/bills/bill/2018/10/>

<https://www.dataprotection.ie/docs/Home/4.htm>

<http://gdprandyou.ie/>

This Privacy Policy provides detailed information on the type of data collected, where, when and why it is collected, who has access to it and how it is collected, used and kept secure. Please read this privacy policy carefully. By using this Site and any functions on it, you are agreeing to be bound by this policy in respect of the information collected about you via this Site. If you have any queries or comments about the policy or our use of your personal information, please get in touch with us by emailing dataprotection@tearfund.ie or writing to The Data Protection Officer, Tearfund Ireland, 2nd Floor, Ulysses House, 22-24 Foley Street, Dublin 1, D01 W2T2.

2. What Information We Collect and How?

We collect information that is personal data. As you use our website, get in touch with us, take part in our campaigns and activities or make a donation, we gather personal data which is information that can be used to identify you, including Internet protocol (IP) addresses i.e. the location of the computer on the internet and details of pages visited on our website and files downloaded. We also collect information about the services you use on our website, any purchases or financial transactions you make and preferences you give.

Information on what activities in Tearfund Ireland you are interested in and your contact preferences may also be collected to help us improve the quality and relevance of our communications with supporters. You have full control over this information because we only collect it when you give it to us by filling in a paper form, subscribing online or initiate contact via the “contact us” link on the web page.

2.1 Information that you give us directly

This includes information you voluntarily make available to us when you sign up to any of our campaigns and activities in person or online. Personal data collected may include your name, postal and email addresses, landline and mobile phone numbers and bank account details.

If you attend a Tearfund Ireland event, it is possible that a photograph of you may be taken and with your consent, may be used on our publicity material including social media.

Most of the data we hold is given to us directly by our supporters, beneficiaries, and volunteers in the course of interaction with our website, participating in our activities and campaigns, or engaging with our services, development education conferences or marketing and fundraising activities or making donations to us through various means.

2.2 Publicly Available Information

This information may be sourced through our relationships with churches in Ireland and may be specifically related to your church affiliation and office held. Other public data sources include company directorships, published biographical information, philanthropic interests and activities and directorships. We may also gather information about you from public sources including the Companies Registration Office and the media - including printed material, digital media and social networks.

2.3 Information we gather from our website cookies

Cookies are small alphanumeric text files that are automatically placed onto your device by some websites you visit. Tearfund Ireland uses cookies to enhance your experience of our website, increase website performance e.g. by remembering who you are from a previous visit and tailoring your session to your usage preferences, identify how the website is being used and where and how we can make improvements, as well as monitor how our advertisements perform. The information stored by cookies is anonymous and does not relate to specific personal data that we hold. Some of our cookies are vital for the website to operate efficiently whilst others are optional but may decrease the usability or performance of the website.

More information about cookies and tracking is available in this document.

3. Sensitive Information

GDPR classifies certain categories of information as “sensitive personal data” including health information, race, religious beliefs, and political opinions. Tearfund Ireland generally does not collect sensitive personal information. However, if there ever was a need to collect such information there would be a specific, clear reason for doing so. For example, disclosure of health conditions or allergies may be required for catering purposes or disclosure of health conditions required for participation in voluntary activities that may be physically exerting such as a mini marathon.

Sensitive information will only be used for the specific purpose it was provided for.

4. Debit and credit card information

Donations made by card transaction are processed using Realex Payments, our payment-processing partners. We do this in line with the Payment Card Industry Security Standard and do not store your personal or card details on our websites, database or any other form. Personal card details provided on paper donation forms in person, via post or verbally over the telephone, are deleted immediately after payment has been processed.

5. Control and access to your personal information

Tearfund Ireland will never share your information with third party organisations for their own marketing purposes and we will never sell your information for any reason whatsoever. We respect your privacy and will use your information for the purposes you gave it which mainly include marketing and fundraising purposes.

To the extent provided by applicable law, you have the right to obtain confirmation that we hold Personal Data or other information about you, request access to and receive information about the personal data we maintain about you, receive copies of the personal data we maintain about you, update

and correct inaccuracies in your personal data, object and withdraw your consent to the processing of your personal data and have the information blocked, made anonymous or deleted, as appropriate.

We will take reasonable steps to update or correct personal data in our possession that you have previously submitted via our services. Upon your request, we will take reasonable efforts to delete all of your Personal Data and non-identifiable information that you have provided to us, though we cannot delete any aggregate or otherwise non-identifiable information derived from your Personal Data or from your use of our services. If you provide us with any information or material relating to another person(s), you are responsible for making sure that the sharing with us and our further use as described to you from time to time is in line with applicable laws.

You are always given the option to unsubscribe from our mailing lists should you wish. Any queries can be communicated by emailing dataprotection@tearfund.ie or writing to Tearfund Ireland, 2nd Floor, Ulysses House, 22-24 Foley Street, Dublin 1, D01 W2T2.

6. Data Sharing

Tearfund Ireland will never share your data with other organisation for their own marketing purposes. However, a few legitimate situations require us to share your information with external organisations with whom we have a contract to carry out specific tasks for us.

We work closely with a mailing company who send out mass mailing on our behalf and we use email broadcasters. This is the most cost effective and time-friendly way to handle high volume correspondence. We also use software services supplied by third parties which store data on cloud. In each of these cases, we vet our service providers and have written contractual agreements in place which make sure that those organisations have strict data protection systems, policies and controls and are legally compliant to data protection laws.

7. How your Personal Information is utilised

Our work at Tearfund Ireland is largely dependent on the relationships that we build with our supporters, our partners and everyone who is interested in the work we do. Respecting, nurturing and maintaining these relationships is fundamental to Tearfund Ireland and we use communication to keep in touch and give updates on how your support allows us to make a positive impact on the poor and marginalised.

Clarity, honesty and transparency are our basic principles whenever we engage with you or collect and use your personal data. We may use your information for one or more of the reasons listed below. How we use your information depends on your relationship with Tearfund Ireland and the data and consent you have given us:

7.1 Volunteering opportunities

If you are one of our highly valued volunteers, we may use your personal information to manage your volunteering profile, activities, training and updates on campaigns and other fundraising activities. This may involve phoning you, emailing you or sending out to you, newsletters and information about our fundraising appeals so that you can do your job well and that your volunteering experience is mutually beneficial.

7.2 Delivery of core charitable services

We keep details of individuals, partners, donors, beneficiaries and organisations that support the work we do. This means we may have your full name, address, email address, mobile number on file. We may also need to use your information for the prevention of fraud and to identify any misuse or abuse of our services.

7.3 Fundraising, campaigning and marketing

Tearfund Ireland holds a range of fundraising and marketing activities and runs many campaigns during any given year. These activities are for the purpose of raising income and promoting the work we do as “Christians passionate about the local church bringing justice and transforming lives – overcoming global poverty.”

The range of activities and channels we use for marketing, campaigning and fundraising includes church talks, development education, advertising (print, broadcast and digital) direct marketing and public relations. We may communicate with you about specific emergency appeals, competitions, fundraising activities that you could hold, assist with or support, events or volunteering opportunities.

7.4 Operational purposes

Tearfund Ireland employs staff both in Ireland and abroad. Our team members are crucial to raising funds, delivering our programmes and gathering, maintain and reporting financial information to the highest standards possible. They also offer professional and technical support to ensure success and quality in the operational activities of Tearfund Ireland. Information on employees is collected and processed for the purposes of recruitment, induction, training, staff administration, remuneration, pensions and performance management.

7.5 Analysis and market segmentation

Whenever Tearfund Ireland responds to an emergency or needs to raise funds for continuing development work, we have to communicate our intentions and ask people for financial support. In order to draw up our mailing lists, a data analysis and market segmentation exercise is carried out to identify our best audience in each particular instance. This is the most efficient and cost effective approach for us and it also ensures that you only receive information that is genuinely interesting and relevant to you, based on the information you have given us and your interaction with our services.

7.6 Profiling

We may, to a limited extent, combine the personal information you have given us with information that is within the public domain to create a profile of your interests and commitments that are relevant to your existing and potential engagements with Tearfund Ireland. The information gathered here may include any church affiliation and offices held, company directorships, published biographical information, philanthropic interests and activities, company directorships and media coverage. We may also gather information about you from publicly available sources including the Companies Registration Office and the media - including digital media, to help us understand more about you and your interests to help us decide what volunteering opportunities may be of interest to you and how your support and involvement with Tearfund Ireland can be maximised. Profiling also helps us to control the frequency and type of communication directed at you so that you are not inundated with emails and letters that are not relevant to you, whilst keeping our administrative costs as low as possible. You can opt-out of personal profiling by emailing us at dataprotection@tearfund.ie.

8. Lawfully processing your data

Data protection laws stipulate 6 data processing conditions which are **Consent** – the individual has freely given their clear and unambiguous explicit consent; **Necessity for performance of a contract** – The processing is necessary for the performance of a contract with the individual, or in order to take steps at the request of the individual prior to entering into a contract; **Legal obligation** – the processing is necessary for compliance with a legal obligation to which the controller is subject; **Legitimate interests** – the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interest or fundamental rights and freedoms of the individual; **Vital interests** – the processing is necessary in order to protect the vital interests of the individual or of another natural person; **Public functions** – the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

8.1 Consent

Tearfund Ireland will also seek your consent to hold your data and to communicate with you by email, phone or post. In accordance with GDPR, a clear record of how and when this consent was obtained is kept and you can withdraw consent for all channels and activities at any time, by emailing dataprotection@tearfund.ie or writing to Tearfund Ireland, 2nd Floor, Ulysses House, 22-24 Foley Street, Dublin 1, D01 W2T2. Telephone: +353 (1) 878 3200.

8.2 Necessity for performance of a contract

Most of Tearfund Ireland's relationships with supporters and beneficiaries are voluntary and not contractual. The contractual relationships we form are generally in relation to our staff and in some instances, our volunteers.

8.3 Legitimate interests

Tearfund Ireland has invested a lot of time and resources into meeting GDPR requirements and making sure that we are compliant in the way we source, store and process personal data. During this exercise Tearfund Ireland has assessed the storage and processing of its large supporter database of information acquired over many years and given freely by our supporters.

In the vast majority of cases, supporters engage with us frequently through prayer support, participation in campaigns and fundraising activities and ongoing regular or occasional donations. For both practical and cost effectiveness reasons, it has not been practical to re-seek the consent of thousands of supporters on our database. In many situations, the best approach for Tearfund Ireland has been to process personal data based on legitimate interests, explained below.

This data is held and processed in a fair and balanced manner and only as necessary, for the legitimate purposes of engaging with the local church in bringing justice, transforming lives and overcoming global poverty and for communicating our progress and needs with the people who make this work possible, our supporters, donors, beneficiaries, volunteers, staff, board members and any other interested parties.

Governance

Tearfund Ireland is a Company limited by guarantee, granted charitable status by the Revenue Commissioners under reference CHY 8600 and holder of Charities Regulator Number 20021337. Data is used for purposes of governing it within the scope of its Constitution, its Articles and Memorandum of Association and the laws of the country e.g.

- Financial accounting and internal and external audits
- Filing of annual returns and statutory reporting
- Reporting criminal acts and for compliance with laws and agencies including Revenue and Irish Charities Regulator

Operational Management

Data is used for a wide range of functionality purposes e.g.

- Recruitment, selection, induction, training and monitoring for employee and volunteer performance management and workforce planning.
- Provision and administration of staff benefits such as pensions.
- Processing for historical research and statistical purposes.
- Salary, pensions, expenses reimbursements for staff and volunteers

Financial Management & Control

- Recording financial transactions and processing, maintaining and controlling financial records
- Fraud prevention, detect and hinder misuse of services and/or money laundering
- Enforcement of legal claims

Administration

- Database maintenance, updating and reporting purposes
- Administration of financial transactions including card and electronic transfers.
- Acknowledging donations by email or postal mail
- Managing computers, IT and security networks and physical security

Publicity and Income Generation

- Data analysis to identify individual preferences and interests in order to communicate in a relevant, suitable and tailored manner and enhance digital and postal communications.
- Profiling, including the use of publicly available information
- Data processing for research purposes
- Advocacy and raising awareness and exercising the right to freedom and expression by speaking out to address injustice and inequality
- Initiating communication with churches, schools and other organisations to publicise our appeals and campaigns.
- Direct marketing, publicity and/or advertisements.

If at any time you wish to change the way we use or data or no longer wish to have us communicate with you about our marketing and fundraising activities please contact us by emailing dataprotection@tearfund.ie or writing to Tearfund Ireland, 2nd Floor, Ulysses House, 22-24 Foley Street, Dublin 1, D01 W2T2 or telephone +353 (1) 878 3200.

8.4 Legal obligation

Data is processed in accordance with laws governing charities and legal entities in Ireland including but not limited to Revenue Commissioner for tax purposes, Workplace Relations Commissioner for employment law regulation, Companies Registration Office (CRO) for the enforcement of the Companies Act and Irish Charities Regulator.

Tearfund Ireland also signs up to Codes of Conduct with bodies governing the International Non-Governmental Organisations (INGOs) such as Dóchas' Code of Conduct on Images and Messaging.

9. Access and data security

Tearfund Ireland is registered Charity CHY 8600. Our staff and board members will have access to your information largely for operational purposes. To a lesser extent, our volunteers will have restricted access to suit the purpose of their work requirements during engagement with us. In the event that we use a third party to process data for bulk mailing, we will be sure to conduct stringent pre-contract audits to ensure that the organisation we engage with are also in compliance with General Data Protection Legislation and that our relationship is governed by relevant contracts and signed agreements that meet our own data protection criteria. We will not disclose, sell or distribute your information to any third party without your permission unless we are required to do so by law.

We take reasonable steps to protect the data provided via our services. We maintain administrative, technical, electronic and physical safeguards designed to protect the Personal Data you provide. However, no internet or email transmission is ever fully secure or error free. Therefore, you should take special care in deciding what information you send to us via email. Please keep this in mind when disclosing any Personal Data to us via the internet. We store Personal Data only for as long as it is necessary for the fulfilment of the purpose for which the Personal Data was collected, unless otherwise required or authorised by applicable law. We take measures to destroy or permanently de-identify personal information if required by law or if the Personal Data is no longer required for the purpose for which we collected it.

You are entitled to view, amend or delete the personal information that we hold and you are always given the option to unsubscribe from our mailing lists should you wish to stop receiving mail. This can be done by selecting unsubscribe on the webpage or by emailing us at dataprotection@tearfund.ie or writing to Tearfund Ireland, 2nd Floor, Ulysses House, 22-24 Foley Street, Dublin 1, D01 W2T2. Telephone +353 (1) 878 3200.

10. Data Retention

Tearfund Ireland will maintain data only as necessary and for purposes already detailed under Legitimate Interests.

When we no longer have legal reasons to store data it is either made anonymous and archived or deleted. For example, details of legacy income are kept until the legacy administration and communication with the family is complete. Tearfund Ireland's Data Retention Policy and Guide to Document Retention may be referred to for more detail.

11. Cookies and tracking

Like all websites, our servers automatically record 'log files' containing information about the volume and characteristics of our website traffic e.g. I.P. address, numbers of pages viewed, length of time spent on site. We use log files to build pictures of how our site is used that help us to monitor and improve the service. We cannot identify you from your log files.

Most internet browsers are pre-set to accept cookies but if you prefer not to receive cookies, you can adjust your browser to refuse cookies or to warn you when they are being used. If your browser is using the standard settings and it is accepting cookies, when you visit Tearfund Ireland websites you are giving consent for cookies on the Tearfund Ireland sites to be stored on our computer. If you do not wish for this to happen, you can disable them in the settings of your browser. This has to be done on each different browser you use. For more information about how to disable cookies in different browsers or for more information about cookies visit <http://www.aboutcookies.org/> or <https://www.oic.ie/>.

If you have concerns about cookies from advertisers, you can see which ones are being used on your computer and turn them off by visiting <http://www.youronlinechoices.eu/> Separate devices have different preferences so each device will need to have its settings changed to your preferences.

12. What We Don't Do

We do not, under any circumstances:

- Link IP addresses to anything personally identifiable
- Share the information we track on this site, in any form with advertisers or any other parties
- Release personal information about any individual visitor
- Links to other websites

This privacy notice does not cover links within this site linking to other websites. Those sites are not governed by this Privacy Policy, and if you have questions about how a site uses your information, you'll need to check that site's privacy statement.

13. Anti-spam policy

This Anti-Spam Policy Notice governs the use of the web page at and its associated services, web pages, domains and sub-domains, which are owned and operated by Tearfund Ireland. The Site should not be used as a database for direct marketing by phone or SMS messaging. The contact details contained on this site are for the sole purpose of those considering working with Tearfund Ireland and should not be used for any other purpose. It is an offence to send unsolicited direct marketing messages or make unsolicited marketing phone calls. We consider spamming to be any activity whereby you directly or indirectly transmit email messages to any email address that has not solicited such email and does not consent to such transmission. We also consider spamming to constitute posting messages on our social media channels (e.g. Twitter, You Tube Channel, Facebook Page, etc.) that are off topic. We reserve the right to remove your messages and or block your access to our Pages if deem you to be in violation of these anti-spamming policies. If you are "spammed" by any other product or service provider on our channels, please let us know and we will take the necessary actions.

14. Changes to our privacy policy

At times it may be necessary for us to make changes to this Privacy Policy. We reserve the right to update or modify this Privacy Policy at any time and from time to time without prior notice. Please review this policy periodically, and especially before you provide any Personal Data. This Privacy Policy was last updated on the date indicated above. Your continued use of the Services after any changes or revisions to this Privacy Policy shall indicate your agreement with the terms of such revised Privacy Policy.

15. Site Information

The information contained in this website has been provided by Tearfund Ireland. It is not intended to be used for legal purposes. While every care has been taken to ensure that the content is useful and accurate, Tearfund Ireland and any contributing third party shall have no legal liability or responsibility for the content or the accuracy of the information so provided, or, for any loss or damage caused arising directly or indirectly in connection with reliance on the use of such information. Notwithstanding the generality of the foregoing, if errors are brought to our attention we will try to correct them.

16. Data Breach and Complaints Procedure

If you encounter any problems with this website or in the unfortunate event that due to any reason beyond our control your data is compromised, we urge you to bring this to our immediate attention by emailing dataprotection@tearfund.ie or writing to Tearfund Ireland, 2nd Floor, Ulysses House, 22-24 Foley Street, Dublin 1, D01 W2T2. Telephone: +353 (1) 878 3200 and we will prioritise investigating the matter with urgency, revert to you. Tearfund Ireland have a Data Breach Policy which details the procedures and processes we have in place to address situations that may evade all the precautions we have taken to protect your personal data.

17. Jurisdiction and Governing Law

This website is hosted and administered in Ireland and any disputes shall be governed by and construed in all respects in accordance with Irish law and you hereby irrevocably submit to the exclusive jurisdiction of the courts of Ireland for the purposes of any proceedings arising out of or in any way relating to this Agreement or any other proceedings in any way connected with the subject matter of this website.

18. Privacy Policy

This statement discloses the privacy practices for the Tearfund Ireland. We respect the privacy of those individuals who visit and use our site and therefore developed this privacy policy to demonstrate our firm commitment to your privacy and the protection of your information and in adherence to guidelines set out in the General Data Protection Regulation (GDPR) effective 25th May 2018. This document has been developed with the recognition that internet technologies are rapidly evolving, and accordingly any changes and updates will be made accordingly and immediately be posted on this page.

If you have any questions about this policy or about your personal data with Tearfund Ireland, please email or write to:

The Data Protection Officer

Tearfund Ireland
2nd Floor
Ulysses House
22-24 Foley Street
Dublin 1
D01 W2T2

Email: dataprotection@tearfund.ie

Telephone: +353 (1) 878 3200

Our Data Protection Officer is Libby Sweetman.