



*BREAK THE CYCLE*

**Cycle Against Suicide**

**Privacy Policy**

**May 2018**

## **Cycle Against Suicide – Privacy Policy**

Cycle Against Suicide holds in high regard the trust that our stakeholders including followers, users and participants of our programmes/events place in us when they give us access to their personal data. This Privacy Policy describes how we work to maintain this trust and protect their information.

This statement sets out the basis of how any personal data Cycle Against Suicide collects from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.cycleagainstsuiticide.com](http://www.cycleagainstsuiticide.com) you are accepting and consenting to the practices described in this statement. Our website may, from time to time, contain links to and from the websites of other organisations. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for them. Please check these policies before you submit any personal data.

### **Who Are We?**

For the purpose of the General Data Protection Regulation (GDPR), Cycle Against Suicide (Fight Against Suicide), is the data controller with the registered office at: 1<sup>st</sup> Floor, 6 Lapps Quay, Cork. Registered Charity Number: 20083151; Chy No: 20867. Cycle Against Suicide is a national awareness charity striving to break down the barriers around mental illness and works to increase awareness of the supports and treatments that are available to empower those affected.

### **Purposes for Processing**

We process data about people for the following purposes:

- Sales and marketing
- Fundraising
- General office administration and accounting
- Volunteer management
- Executing projects and events
- Schools programme
- Management of subcontractors

### **Personal information you give us**

You may give us information about you, when you enquire about our activities, fill in forms on our website [www.cycleagainstsuiticide.com](http://www.cycleagainstsuiticide.com) or correspond with us by phone, e-mail or otherwise provide us with personal data. The information you give us may include your first name, surname, postal address, e-mail address, phone number, date of birth, financial and credit card and/or debit card information, your personal preferences about being contacted, your comments about our services and your photograph.

### **Our use of your personal data**

We will use this information for a number of operational purposes, including, but not limited to:

- carrying out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us;
- to provide you with information about other opportunities to support Cycle Against Suicide where you do not object to receiving such information;
- to create an account for you if you register with us as a donor or if you wish to receive information about our activities;

- to further our charitable aims, including for fundraising activities, where you agree to receive such information;
- to provide you with information about our product and services or information on mental health services that we feel may be of interest you.

### Where we store your personal data

Cycle Against Suicide may, from time to time, make use of services provided by third party processors for the delivery of our services which may necessitate the transfer of personal data outside of the EU or the European Economic Area ("EEA"). For example, we use a variety of cloud-based tools such as mail chimp, Office365 and similar tools. In order to safeguard your information we will make any such transfers in strict compliance with data protection legislation with all appropriate contractual arrangements (Privacy Shield, Binding Corporate Rules, or Model Contracts) will be in place. By submitting your personal data for such purposes, you agree to this transfer, storing or processing. Cycle Against Suicide will take all reasonable steps necessary to ensure that your personal data is processed securely and in accordance with this Privacy Statement.

All information you provide to us is stored on secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, subject to the previous paragraphs, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted via our site; any transmission is ultimately at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access to, or unlawful processing or disclosure of, such data.

### Categories of Information Processed

#### Processing Purposes

#### Personal Data Processed

<b>Sales and Marketing</b>	Contact Names Telephone numbers (land line and mobile) Social Media Identifiers (e.g. Twitter accounts) Email Addresses Postal Addresses
<b>Fundraising</b>	Contact Names Telephone numbers (land line and mobile) Social Media Identifiers (e.g. Twitter accounts) Email Addresses Postal Addresses
<b>Accounting / Corporate Services</b>	Contact Names Contact details (e.g. address, email address, telephone number) Tax identifiers (e.g. Irish PPS number for employees or VAT number for subcontractors) Expenses sheet Data associated with accounts receivable or accounts payable

<b>Volunteer Management</b>	Contact Names Telephone numbers (land line and mobile) Email Addresses Postal Addresses
<b>Schools Programme</b>	Contact names for teachers Telephone number (land line and mobile) Social Media Identifiers for schools Email addresses Postal addresses Bank details for payments re. Congress / fundraising
<b>Events</b>	Contact names (for project stakeholders, participants) Email addresses Contact telephone number Bank details
<b>Health and Safety</b>	Accident reports, including details of injuries and contact information for injured parties or witnesses
<b>Website Performance, Management and Security</b>	IP addresses (in server log files)

## Grounds for processing – processing condition replied upon

### Grounds for processing

### Processing condition relied upon

<b>Sales and Marketing</b>	Consent Legitimate Interest (for postal direct marketing)
<b>Fundraising</b>	Consent Statutory Obligations Legitimate Interest: It is in the legitimate interest of Cycle Against Suicide to process information for receipt of donations.
<b>Accounting / Corporate Services</b>	Statutory Obligations: Necessary for the execution of contractual obligations. Legitimate Interest: It is in the legitimate interest of Cycle Against Suicide to process information for administration and compliance with accounting requirements.
<b>Volunteer Management</b>	Statutory Obligations (payment of expenses) Legitimate Interest: It is in the interest of Cycle Against Suicide to efficiently and effectively manage volunteers and ensure compliance with duty of care and other obligations.
<b>Schools Programme</b>	Legitimate Interest: It is the legitimate interest of Cycle Against Suicide to engage in with schools in the delivery of our schools programme.
<b>Events</b>	Necessary for execution of contracts.

	Legitimate Interest: It is the legitimate interest of Cycle Against Suicide to engage in marketing to promote its products or services.
<b>Health and Safety</b>	Legitimate Interest: It is in the legitimate interest of Cycle Against Suicide to process data about health and safety issues for the purposes of seeking legal advice, defending claims, and supporting insurance risk assessment. Statutory Obligations.

## Your rights with regard to your information

You have rights under Irish Data Protection legislation, with regard to our processing of your data. You can exercise these rights at any time by contacting us via email at [info@cycleagainstsucide.com](mailto:info@cycleagainstsucide.com) or in writing at: The CEO, Cycle Against Suicide, 6 Lapp's Quay, Cork.

For processing activities for which we rely on consent as a basis for processing your data, you have the right to withdraw your consent at any time.

You have the right to be informed about any personal data that we hold which relates to you (Right of Access), including how we acquired such data, and the purposes for which it is being used. This right requires that you will be given a copy of your personal data which you may have supplied to us via our website or in other correspondence and interactions.

To exercise this right, you must make your request in writing, posting it to our address as specified below and including with the request, a copy of your passport and a copy of a utility bill which will verify your address. No fee is required for this service. A request will be dealt with as soon as possible and we will respond to your request within one month from the date on which your request was received.

You have the right to have inaccurate personal data corrected (Right of Rectification). If you discover that we hold inaccurate personal data about you, you have a right to instruct us to correct that information. Such an instruction must be in writing and must contain evidence of the correct information. We will respond as soon as possible, and in any event within one month from the date on which your instructions are received.

In certain circumstances, you have the 'Right to be Forgotten'. This means that you can request that Cycle Against Suicide removes any and all references to you from our records and systems. We will comply with all such requests in a timely manner, as required by the Data Protection Regulation, unless other operational or legal obligations require us to retain such data for a particular purpose or period of time.

You have the right, at all times, to object to processing of your personal data which you find intrusive, excessive or unwarranted (Right to Restrict Processing). Cycle Against Suicide will respect your right to do so, but may need to continue such processing where required to do so by law, or within the terms of an existing contractual arrangement.

## Cookies and Similar Technologies

Cycle Against Suicide does not use website analytic technologies currently. Any cookies that are written by the site are necessary for the operation of services. Where we have embedded videos or other 3<sup>rd</sup> party content, it is our policy to use embedded codes that do not write cookies until

you interact with the video or other content. Should our policy on cookies change, this statement will be updated accordingly.

### **Retention Period**

Cycle Against Suicide retains personal data about individuals for a range of periods. The basis for our retention periods are based on:

- Statutory obligations
- Contractual obligations
- For reasonable periods after the conclusion of engagements for quality assurance and risk management purposes.

On a case by case basis, records may be retained for longer where required for actual or potential legal actions or the management or mitigation of operational or strategic risks to Cycle Against Suicide. Where records are subject to this kind of 'hold' process, the ongoing retention will be reviewed on an annual basis.

### **Changes to our privacy statement**

Any changes we may make to our privacy statement in the future will be posted on this page. Please check this Privacy Statement occasionally to see any updates or changes to our privacy statement.

### **Contact**

Questions, comments and requests regarding this privacy statement are welcomed and should be addressed to: The CEO, Cycle Against Suicide; [info@cycleagainstsucide.com](mailto:info@cycleagainstsucide.com)