



Alzheimer Society of Ireland - Data Protection - Fair Processing Notice

Who are we? The Alzheimer Society of Ireland is a company limited by guarantee and a registered charity in the Republic of Ireland (CHY 7868).

What do we do? The Alzheimer Society of Ireland (ASI) works within communities across the country providing dementia related services such as day care, home care, respite, dementia advisors, support groups, social clubs and a national helpline. We process personal data (identifying information) and special category personal data (more sensitive data such as health information) to carry out this work.

Who do we process data about? ASI processes data about service users and their carers/family members/representatives to provide health and social care. ASI does not engage in profiling or automated decision making with your data.

What kind of data is processed by us? ASI processes different types of personal data and special category personal data for the purpose of providing you with health and social care services. We will process all or some of the following data to create your service user file: Contact name, address, telephone number, email, health data, details for carer/family member/representative, photographs, life stories, attendance records, update reports for carers and details of a payment method (if relevant). For safety and security reasons, we will record any relevant incidents or accidents that occur and we may capture your image if a CCTV system is in use at an ASI location.

Where did we get your data from? We get your data when you or your carer/family member/representative contacts us to request that you become a service user; or a health or social care professional shares your data with us by way of a referral.

What are our legal grounds for processing? In order to provide health and social care services:

- ASI processes personal data on the legal basis of legitimate interests. (Article 6.1.f GDPR) *It is within the legitimate interests pursued by ASI to efficiently and effectively manage our provision of health and social care for service users and their carers/family members/representatives while ensuring compliance with duties of care and other obligations.*
- ASI processes special category personal data on the legal basis of the provision of health and social care. (Article 9.2.h GDPR) *This occurs when the special category personal data relates to a service user or a potential service user.*
- ASI processes special category personal data on the legal basis of association / not-for-profit organisation. (Article 9.2.d GDPR) *This occurs when the special category personal data relates to someone other than the service user, e.g. a carer, family member or representative who has regular contact with ASI. This data is not shared outside the charity without the individual's consent.*

How long do we retain your data? ASI keeps personal data and special category personal data for a range of periods. Our current retention policies are based on:

- Statutory obligations;
- Contractual obligations;
- Quality assurance / best practice obligations set by state entities or regulatory bodies;
- Our view that retention is necessary for the original purpose or a compatible purpose;
- 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 they are required for actual or potential legal actions or the management or mitigation of operational or strategic risks to the organisation. Where records are subject to this kind of review the ongoing retention will be assessed annually.

Where do we keep your data? Service providers contracted by ASI hold personal data in digital form in secure data centres inside the EU/EEA. The AIS IT Security and Usage policy details the internal security provisions in place. Hard copy data is stored in locked cabinets and secure rooms.

Do we share your data? In the context of service provision, we will share your data between ASI staff if you need to utilise more than one service. We may share your data with external health or social care professionals (e.g. doctors, public health nurses, social workers or physiotherapists) or relevant health or social care facilities in order for you to receive the best standard of care. Dementia advisors are an exception to this as they do not share data with other ASI staff, nor with external health/social care professionals, unless you specifically request it. Overarching laws may dictate that ASI must share your data with state entities e.g. law enforcement, health authorities and regulatory bodies. In these situations we will nevertheless prioritise your privacy by attempting to satisfy the request by first offering only pseudonymised or anonymised data. We also interface with third party service providers that can access your personal data. These situations are managed by data processor agreements which contain clear contractual safeguards for individuals and their data.

What are your rights? Individuals have rights over their personal data under EU and Irish Data Protection law. These rights are not absolute and qualifications or restrictions can apply. In summary your rights are: Right to be informed; Right of access; Right to rectification; Right to be forgotten/erasure; Right to restrict processing; Right to object; Right not to be subject to automated decision making and/or profiling; Right to portability. You also have the right to make a complaint to the Office of the Data Protection Commissioner info@dataprotection.ie or to seek compensation through the courts.

How can you contact the ASI Data Protection Officer?

Address: DPO, The Alzheimer Society of Ireland, National Office, Temple Road, Blackrock, Co. Dublin.

Email: dataprotection@alzheimer.ie

Ends.