

## **Cairde Gael Linn Privacy Policy**

Cairde Gael Linn is committed to protecting our customer privacy and takes its responsibility regarding the security of Members and Customers information very seriously. We will be clear and transparent about the information we are collecting and what we will do with that information.

### **This Policy sets out the following:**

- What personal data we collect and process about you in connection with your relationship with us as a member/customer and through your use of our website;
- Where we obtain the data from;
- What we do with that data;
- How we store the data;
- Who we transfer/disclose that data to;
- How we deal with your data protection rights;
- And how we comply with the data protection rules.
- All personal data is collected and processed in accordance with Irish and EU data protection laws.

### **Data Controller**

“Cairde Gael Linn” (referred to as “we”, “us”, “our” or “Gael-Linn” in this policy) is the “data controller” of all personal information that is collected and used about our customers for the purposes of [the Irish Data Protection Act 2018]. Cairde Gael-Linn is a registered Charity in Ireland with registration number 84909 and registered offices at Gael-Linn, 35 Dame Street, Dublin 2, Ireland.

### **What personal data we collect**

Personal data means any information relating to you which allows us to identify you, such as your name, contact details, bank or credit card details and photographs. In certain cases, there may be information about your access to our website.

We may collect personal data from you when you become a Cairde Gael Member, purchase a monthly or annual Membership, register with us or when you contact us.

Specifically, we may collect the following categories of information:

- a. Name and home address
- b. In certain circumstances - e-mail address, telephone number & photographs.
- c. Financial and transaction data (e.g., purchase history)
- d. The communications you exchange with us or direct to us via emails and the contact for: <http://gael-linn.ie/contactus>

### **Security and how we store your data**

Any personal information is collected directly through Gael-Linn’s website or via our trusted network of Collectors (Timirí) and Area Managers (Gníomhairí). When received by Gael-Linn, the data is stored securely on our server and secure email.

## **Sharing your personal data**

We will never share your personal data with third-parties, except for our Collectors, as above and PayPal for payment. In relation to photographs of Draw Winners, we will put these in the Cairde Newsletter and/or on Social Media (Facebook and Twitter) with your express permission. We are required by law and the terms of our Lottery Licence to provide a list of Winners to the Gardaí after each Draw.

## **What do we use your personal data for, why and for how long:**

Your data may be used for the following purposes:

- Providing prize cheques for Draw Winners and communicating the results of the Draw and competitions
- Providing the products and services you request: we use the information you give us to perform the services you have asked for in relation to your Cairde Gael Linn Membership
- Contacting you about any Membership related activities, queries or competitions.
- Administrative or legal purposes: we may use your data for statistical and marketing analysis, systems testing, maintenance and development, or in order to deal with a dispute or claim.
- Marketing: from time to time we may contact you with information regarding our products via e-communications. You will be given the opportunity on every e-communication that we send you to indicate that you no longer wish to receive any direct marketing material.
- We will only process your personal data where we have a legal basis to do so. The legal basis will depend on the reasons we have collected and need to use your personal data for.
- We will not retain your data for longer than is necessary to fulfil the purpose it is being processed for. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means.
- We must also consider periods for which we might need to retain personal data in order to meet our legal obligations, or to deal with complaints, queries and to protect our legal rights in the event of a claim being made.
- When we no longer need your personal data, we will securely delete or destroy it. We will also consider if and how we can minimise, over time, the personal data that we use, and if we can anonymise your personal data so that it can no longer be associated with you or identify you, in which case we may use that information without further notice to you.

## **Cookies and site tracking**

We do not use Cookies or site tracking.

## **Data Protection Officer**

We have appointed a Data Protection Officer (“DPO”) to oversee compliance with this policy. You have the right to make a complaint at any time to a supervisory authority. The Irish Data Protection Commissioner is the lead data protection supervisory authority for Gael-Linn, as an Irish data controller.

## **Your Data Protection Rights**

Under certain circumstances, by law you have the right to:

- Request information about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request transfer of your personal information in an electronic and structured form to you or to another party (commonly known as a right to “data portability”). This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.
- Withdraw consent. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you want to exercise any of these rights, then please submit a request via:

- a. Our website: <http://gael-linn.ie/contactus>
- b. By post: The Data Protection Officer, Cairde Gael-Linn, 35 Dame Street, Dublin 2, Ireland.
- c. By email: [cairde@gael-inn.ie](mailto:cairde@gael-inn.ie)

You will not have to pay a fee to access your personal information (or to exercise any of the other rights).

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **Changes to Privacy Policy**

Our Privacy Policy may change from time to time and any changes to the statement will be communicated to you by way of an e-mail or a notice on our website.

## **Contact Us**

If you have any questions regarding this Privacy Policy you can contact us via email at: [cairde@gael-inn.ie](mailto:cairde@gael-inn.ie) or via postal mail at:

The Data Protection Officer,  
Cairde Gael-Linn, 35 Dame Street, Dublin 2, Ireland.