

Spirasi Website Privacy Notice

August 2021

Website Privacy Notice

About Us

We are Spirasi. Within this Privacy Notice 'we' and 'us' means Spirasi. We aim to help those who flee torture and severe trauma through our services. In order to provide our services, we need to use your personal information. We are committed in all our uses of your personal data to protecting and respecting your privacy.

We are a registered charity (Irish registered charity number: 16923) and company (Irish registered company number: 476831). Our full name is Spiritan Asylum Services Initiative

About this Privacy Notice

This Privacy Notice will tell you about what personal data we collect, how we use your personal data and your right to protect your personal data. This Privacy Notice applies to:

- Visitors to our website;
- Individuals (other than Spirasi's clients) whose personal data is provided to us in connection with the provision of our services; and
- Individuals (other than Spirasi's clients) who we communicate or interact with in the course of providing our services.

This Privacy Notice does not apply to Spirasi's clients. If you are a client of Spirasi you will be presented with a different privacy notice when you provide your personal data to us, which explains how Spirasi processes your personal data in connection with the provision by Spirasi of its services to you and your rights in relation to that data. [You can view this privacy notice [here](#).]

If you do not understand any part of this Privacy Notice please ask the Data Protection Officer at info at spirasi.ie; or write to Data Protection Officer, Spirasi, 213 North Circular Road, Phibsborough, Dublin 7.

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Cookies

We use cookies on our website and this is explained [here](#)

1. Your Personal Information

Your *personal information* is any information about you that can be used to identify you including your name, date of birth, postal address, e-mail address and telephone number.

2. What personal information do we collect? Why do we collect it?

Type of Personal Information	Purpose	Legal Basis
Administrative: name, address, contact details (phone, mobile, email). ¹	To support the administration of our organisation including the provision of our services and information about those services.	This processing is necessary for our legitimate interests in managing Spirasi's charitable activities. You have the right to object to us processing your personal data on this basis.

3. Who do we share your information with?

With regard to assessments and ongoing care and support of our clients, we may share data with the following non-Spirasi persons:

Health and social care providers	GPs, HSE, hospitals and clinics, occupational therapists, speech and language therapists, social workers, pharmacies, counselling services, hospital laboratories.
Service Providers	Service providers under contract with us including IT providers such as Salesforce and Thesaurus Software.
Other Third Parties	Solicitors, Social Protection, the International Protection Office, Tusla, Reception Integration Agency and accommodation providers such as De Paul Trust.

4. How long do we keep your personal information?

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We will retain personal data only for as long as necessary for the purposes for which it was collected; as required by law or regulatory guidance to which we are subject; and for the exercise or defence of legal claims that may be brought by or against us.

For more information, please contact ask the Data Protection Officer at info at spirasi.ie; or write to Data Protection Officer, Spirasi, 213 North Circular Road, Phibsborough, Dublin 7.

5. Transfers of Information

The data that we collect from you may be transferred to, and stored at, destinations both within and outside the European Economic Area (**EEA**), for example, we use an IT provider that is located in the US .

We want to make sure that your personal data is stored and transferred in a way which is secure. We will therefore only transfer data outside of the EEA where it is compliant with the GDPR and the means of transfer provides adequate safeguards in relation to your data. For example, this could be:

- by way of a data transfer agreement with a third party, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by controllers in the EEA to controllers and processors in jurisdictions without adequate data protection laws; or
- by transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or
- where you have explicitly consented to the data transfer.

Where we transfer your personal data outside the EEA and where the country or territory in question does not maintain adequate data protection standards, we will take all reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Notice.

6. Your Rights

You have number of rights in relation to how we use your personal information.

Object	You have a right to object to us processing your personal information where we do so on the basis of our legitimate interests to do so for research purposes.
Withdraw consent	Where we have obtained your consent to process your personal information, you may withdraw this consent at any time. We will cease to use your data for that purpose unless we consider that there is an

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	<p>alternative legal basis to justify our continued processing of your data for this purpose, in which case we will inform you of this condition.</p>
Access	<p>You may ask us for a copy of the information we hold about you at any time, and request us to modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this unless permitted by law. If you request further copies of this information from us, we may charge you a reasonable administrative cost. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.</p>
Deletion	<p>You have the right to request that we "erase" your personal data in certain circumstances. Normally, this right exists where:</p> <ul style="list-style-type: none">• It is no longer necessary for us to hold the information for the purpose for which we obtained it;• You have withdrawn your consent to us using your information, and there is no other valid reason for us to continue;• Your information has been processed unlawfully;• It is necessary for the information to be erased in order for us to comply with our obligations under law; or• You object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing. <p>We would only be entitled to refuse to comply with your request for erasure in limited circumstances and we will always tell you our reason for doing so. When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.</p>
Restrict processing	<p>You have the right to request that we restrict our processing of your personal information in certain circumstances, for example if you dispute the accuracy of the personal information that we hold about you or you object to our processing of your personal information for our legitimate interests. If we have shared your personal information with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal information.</p>
Rectification	<p>You have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. You may also request details of the third parties that we have disclosed the inaccurate or incomplete</p>

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	personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.
Portability	If you wish, you have the right to transfer your personal data between service providers. In effect, this means that you are able to transfer the details we hold on you to another third party. To allow you to do so, we will provide you with your data in a commonly used machine-readable format so that you can transfer the data. Alternatively, we may directly transfer the data for you.
Contact Us	If you wish to exercise any of these rights, please contact us at info at spirasi.ie or call us at (01) 838 9664. We will respond to your request within one month. That period may be extended by two further months where necessary, taking into account the complexity and number of requests. We will inform you of any such extension within one month of receipt of your request. We may request proof of identification to verify your request. We have the right to refuse your request where there is a basis to do so in law, or if it is manifestly unfounded or excessive, or to the extent necessary for important objectives of public interest.
Further information	<p>You also have right to lodge a complaint with the Data Protection Commission or another data protection authority, in particular in the Member State of your residence, place of work or place of an alleged infringement, if you consider that the processing of your personal data infringes the GDPR.</p> <p>Further information in respect of your rights is available at the website of the Office of the Data Protection Commission, www.dataprotection.ie.</p>

Changes to how we use your Personal Information

This Privacy Notice was last updated on **[18 August 2021]** and may change from time to time. We will use your more recent contact details we have to notify you of material changes.

7. Contact Us

If you have any questions about this Privacy Notice or the privacy and/or security of personal information submitted to us, please email the Data Protection Officer at info at spirasi.ie write to Data Protection Officer, Spirasi, 213 North Circular Road, Phibsborough, Dublin 7. All requests will be dealt with promptly and efficiently.

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