



# Public Website Privacy Statement



## **Aster Family Support - Website Privacy Notice and Cookie Notice**

<b>Title:</b>	Privacy Notice – public – Website Statement
<b>Document Type:</b>	Notice – online
<b>Reference/version no:</b>	2
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<b>Last Updated:</b>	29 <sup>th</sup> July 2019
<b>Background:</b>	Outward facing data protection notice - to be posted online and made available in any other appropriate means

### **EXPLANATORY NOTE REGARDING THIS DOCUMENT**

***The purpose of this notice is to deal with data controllers' obligations under Articles 13 and 14 of the GDPR. The controller is obliged to supply information where personal data is collected directly from a data subject and where data is collected indirectly by the controller.***

***This notice, should contain clear and plain language so that data subjects can understand whether, by whom and for what purpose data is being collected.***

***Controllers are required to notify data subjects about all processing activity it carries out together with an explanation of the legal basis or the grounds for processing this data.***

Article 13 notices (which should be drafted where controllers collect personal data directly from data subjects) are required to include the information set out in 1 to 6 below. The default position is that all information set out in numbers 7 to 12, below, should be provided to the data subject unless one or more categories of the information does not exist or is not applicable.

1. The identity and the contact details of the controller and, where applicable, of the controller's representative;
2. The contact details of the data protection officer, where applicable;



3. The purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
4. The fact that processing is necessary for legitimate interest of the controller or a third party;
5. Names of the third-party recipients who will receive the data;
6. Whether the data will be transferred outside the EEA;
7. The period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
8. the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
9. where the processing is based on the data subject's consent or when the data subject has given explicit consent to the processing of special categories of data, the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
10. The right to lodge a complaint with a supervisory authority;
11. Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data;
12. The existence of automated decision-making, including profiling.


Article 14 notices (to be drafted where personal data is collected indirectly from the data subject) should include the information at parts 1 to 6 below and from 7 to 12 unless one or more categories of the information does not exist or is not applicable:

1. The identity and the contact details of the controller and, where applicable, of the controller's representative;
2. The contact details of the data protection officer, where applicable;
3. The purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
4. The categories of personal data concerned;
5. The recipients or categories of recipients of the personal data, if any;
6. Where applicable, that the controller intends to transfer the data outside the EEA;



7. The period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
8. The existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
9. Where the processing is based on the data subject's consent or when the data subject has given explicit consent to the processing of special categories of data, the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
10. The right to lodge a complaint with a supervisory authority;
11. Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data;
12. The existence of automated decision-making, including profiling.



	<p><b>Privacy Notice</b></p>
<p><b>IDENTITY</b></p> 	<p><b>WHO ARE WE?</b></p> <p>Aster Family Support annually works with over 150 families through our Family Support, Meitheal, Household Assistance and Triple P services. Based in Unit 18 &amp; 20, Northside Enterprise Centre, Bunratty Drive, Dublin 17 with an office for family appointments in the Northside Civic Centre, and our new Family Resource Centre in 1 Georges Square, Balbriggan, Co Dublin.</p> <p>Our service provision team includes Family Support Workers &amp; Community Development Workers. Our Family Support Workers act as Lead Practitioner for families who engage in the Meitheal process through our Family Support Service.</p> <p>Our name “ASTER” comes from what’s at the heart of our organisation and how we work with families:</p> <p><b>Assist, Support, Teach, Empower, Resource</b></p> <p>For the purpose of the Data Protection Acts 1988 TO 2018 and the General Data Protection Regulation (the GDPR) (the <b>Acts</b>):</p> <ul style="list-style-type: none"> <li>- Aster is a data controller as an employer, when dealing with suppliers and when registering and providing support to users of its services.</li> </ul> <p>Our Data Protection Officer (“DPO”) is Patricia Dunne.</p> <p>Email; <a href="mailto:pdunne@asterfamilysupport.ie">pdunne@asterfamilysupport.ie</a></p>
<p><b>WHAT INFORMATION DO WE COLLECT?</b></p>	<p><b>WHAT PERSONAL INFORMATION DO WE COLLECT FROM YOU?</b></p> <p>You may give us personal data by:</p>



- Corresponding with us by phone, e-mail or otherwise. We ask you to disclose only information necessary to provide you with information about our organisation's work or services.
- Applying to work with us. The type of information you may provide in your CV, application form, a cover letter, your name, address, e-mail address and phone number. CVs should include information relevant to your employment history and education.
- If you work in our organisation as an employee, we collect further information as part of a contract of employment and provision of those services to us as employer;
- We collect supplier information when we engage services from you such as email address and contact details;
- We collect some information if you make a complaint to us;
- Engaging with the services provided by Aster Family Support:

This information collected depends on the service engaged and will include:

- First name
- Surname
- Mother's name
- Father's name
- Date of birth
- Age
- PPS
- Gender
- School / occupation
- Nationality
- Ethnicity
- Mother / father / guardian contact details and address
- Phone number
- Address
- Legal responsibility
- Employment Status
- First language
- Health detail



- Sexual behaviour
- Disabilities
- Learning developments
- Home environment
- Economic security
- Religious or cultural considerations
- Agency supports linked to a child and family
- Sensitive data: physical and mental health, disabilities, ethnicity, nationality, sex / gender, learning disabilities, addictions.
- Presenting mental, medical or addiction issues
- Other individuals in a household
- Complainant details – contact and address

**Cookies:**

Aster uses:

**Front end or Session cookies**

These cookies allow a smoother experience for site visitors.

**Backend Cookies**

These cookies facilitate the management of the site by authorised site administrators.

**Performance or Analytical Cookies**

These cookies collect information about how visitors use Aster’s site.

For example, Aster uses Google Analytics to track anonymized usage statistics for the site. This data is used to analyse how frequently people visit the site, how the website is found and which pages are most frequently viewed. These cookies **don't collect** information that identifies a visitor. This information is combined with data from thousands of other users to create an overall view of website use and is never identified individually or personally. These cookies are only used to identify ways to improve the website



## **WHY DO WE COLLECT THIS INFORMATION?**

We collect the information in order to provide you with local services and follow on services, to improve our site, to recruit staff and to pay our suppliers.

We will use this information:


- To create a profile for you if you are a prospective employee or enter into a contract for the provision of employment services;
- To administer and improve our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To pay suppliers for their services;
- As part of our efforts to keep our site safe and secure;
- Registering you to avail of family support services;
- Registering you to avail of services/attend groups in our Family Resource Centre;
- Registering children to avail of family support services;
- Registering children to avail of services/attend groups in our Family Resource Centre;
- Internal reporting obligations;
- To help us deal with any complaints we receive;
- To allow us advocate on behalf of families registered with us.



The legal bases for the processing of your personal data are:



- Processing necessary for the performance of a contract which you have entered into with us or to take steps at your request prior to entering into a contract;
- Processing necessary for compliance with a legal obligation to which we are subject;
- That you have provided consent for the processing for one or more specified purposes such;
- Processing necessary for the purposes of the legitimate interests where such interests are not overridden by your interests or fundamental rights or freedoms which require the protection of your information.



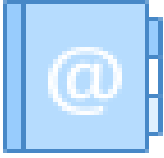



	<ul style="list-style-type: none"> <li>• Processing is necessary in order to protect the vital interests of the data subject or of another natural person.</li> </ul> <p>The legal bases for the processing of your <b>special category or sensitive data</b> are:</p> <ul style="list-style-type: none"> <li>• Processing necessary for compliance with a legal obligation to which we are subject.</li> <li>• In the case of Aster family support services where you have given us explicit consent to process your information in order to deliver appropriate services to you.</li> <li>• In the case of children’s data, where explicit consent has been given to us by a legal guardian or parent.</li> <li>• Processing is necessary in order to protect the vital interests of the data subject or of another natural person.</li> </ul>
<p><b>THIRD PARTY ACCESS TO YOUR PERSONAL DATA</b></p> 	<p><b>WHO DO WE SHARE THIS INFORMATION WITH?</b></p> <p>We may share your personal data with our selected business associates/ suppliers and contractors, to provide you with our services. For example, these business partners may include our web hosting provider and our IT service providers.</p> <p>In addition, we may disclose your personal information to third parties:</p> <ul style="list-style-type: none"> <li>• Department of Social Protection;</li> <li>• Child and Family Agency (Tusla);</li> <li>• Counsellors, General Practitioners or other professionals depending on family requirements;</li> <li>• If we are under a duty to disclose or share your information in order to comply with any legal obligation;</li> <li>• To enforce or apply our terms of use and other agreements; or to protect our rights, property, or safety, our customers, or others.</li> </ul>

	<p>This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.</p> <p><b>DISCLOSURE OF YOUR INFORMATION</b></p> <p>We may also share your information with selected third parties including:</p> <ul style="list-style-type: none"> <li>• Government agencies;</li> <li>• Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.</li> </ul> <p>We attach at <b>Schedule 1</b> a list of all entities with whom your personal data is shared. Aster Family Support obtains consent to sharing on its referral forms.</p>
<p><b>MINIMISATION</b></p> 	<p><b>HOW LONG DO WE KEEP HOLD OF YOUR INFORMATION?</b></p> <p>The time periods for which we retain your information depends on the type of information and the purposes for which we use it. We will keep your information for no longer than is required or permitted.</p>
<p><b>TRANSFERS</b></p> 	<p><b>DO WE TRANSFER YOUR INFORMATION OUTSIDE THE EUROPEAN UNION OR EUROPEAN ECONOMIC AREA?</b></p> <p>No, Aster Family Support does not transfer personal data outside of the EEA</p>
<p><b>YOUR RIGHTS</b></p>	<p><b>WHAT ARE YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA?</b></p> <p>You have the following rights:</p> <ul style="list-style-type: none"> <li>• The right to access the personal data we hold about you.</li> <li>• The right to require us to rectify any inaccurate personal data about you without undue delay.</li> </ul>

	<ul style="list-style-type: none"> <li>• The right to have us erase any personal data we hold about you in circumstances such as where it is no longer necessary for us to hold the personal data or, in some circumstances, if you have withdrawn your consent to the processing.</li> <li>• The right to object to us processing personal data about you such as processing for profiling or direct marketing.</li> <li>• The right to ask us to provide your personal data to you in a portable format or, where technically feasible, for us to port that personal data to another provider provided it does not result in a disclosure of personal data relating to other people.</li> <li>• The right to request a restriction of the processing of your personal data.</li> </ul> <p>Where our processing of your personal data is based on your consent to that processing, you have the right to withdraw that consent at any time but any processing that we have carried out before you withdrew your consent remains lawful.</p> <p>You may exercise any of the above rights by contacting Patricia Dunne our Data Protection Officer at <a href="mailto:pdunne@asterfamilysupport.ie">pdunne@asterfamilysupport.ie</a> 01-5161146</p> <p>You may lodge a complaint with your local supervisory authority with respect to our processing of your personal data. The local Supervisory Authority in Ireland is the Data Protection Commissioner. The website is <a href="http://www.dataprotection.ie">www.dataprotection.ie</a>.</p>
<p><b>CHANGES TO THIS POLICY</b></p> 	<p><b>WHAT WILL HAPPEN IF WE CHANGE OUR PRIVACY NOTICE?</b></p> <p>This notice may change from time to time, and any changes will be posted on our site and will be effective when posted. Please review this notice each time you use our site or our services. This notice was last updated on 29<sup>th</sup> of July 2019.</p>
<p><b>CONTACTS</b></p>	<p><b>HOW CAN YOU CONTACT US?</b></p> <p>Our [Data Protection Officer / Data Protection Contact] can be contacted by phone, email or post</p> <p>By phone: 01-5161146/087-6190782</p>



  	<p>Address: Aster Family Support, Unit 18&amp;20, Northside Enterprise Centre, Bunratty Drive, Dublin 17.</p> <p>On our website contact form: <a href="http://www.asterfamilysupport.ie">www.asterfamilysupport.ie</a></p> <p>Or by email: <a href="mailto:pdunne@asterfamilysupport.ie">pdunne@asterfamilysupport.ie</a></p>
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### Schedule 1

We have set out below a list of third parties with whom we share your data.

<i>Third party name</i>	<i>Description of services provided</i>
MS Office 365	Cloud Services
Banks	Banking Services
Revenue	Tax
Tusla	Child and Family Agency
Dataflow	Payroll
Taxi Services	Client support
Cyclone Limited	Archiving and shredding
Gardai	Security and Policing
I.T Maintenance	Computerology Consulting Limited
Website Maintenance	
Department of Social Protection	Applications