

# WEST LIMERICK RESOURCES CLG WEBSITE PRIVACY STATEMENT

## Who are we?

We are West Limerick Resources Company Limited by Guarantee, registered under company number 206973 at St. Marys Road, Newcastle West, Co. Limerick.

We provide community development, rural and social services in West Limerick. Our objective is to build a stronger community through the enhancement of personal and community identity, values, places, structure and services. WLR does this by delivering a range of Government Funded Programmes in West Limerick.

This notice sets out the basis on which any personal data we collect from you, or from others, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Acts 1988 and 2018 (as amended) (the **Acts**):

- the data controller is West Limerick Resources (“WLR”) as an employer, as a supplier of services to its service users and where dealing with suppliers;
- the data processor is WLR when it collects and processes data on behalf of various Government Departments and Funding Agencies.

Our data protection contact may be contacted at [dataprotection@wlr.ie](mailto:dataprotection@wlr.ie)

Any external links to other websites are clearly identifiable as such, and we are not responsible for the content or the privacy policies of these other websites. While we take care of the safety of information on our website on an ongoing basis, if you are not happy with this Privacy Statement you should not use our website.

## What personal information do we collect?

You may give us personal data by:

- Engaging WLR’s services. Service Users supply us with information which may include their contact details; next of kin or relatives’ contact information; email; business address; PPSN; immigration status; telephone number; tax records; DEASP payment details, spouse/partner PPSN (if on same DEASP claim), name and date of birth of children (if required for DEASP claim), next-of kin details; billing payment details and health related data.
- Corresponding with us by phone, e-mail or otherwise. We ask you to disclose only as much information as is necessary to provide you with our services or to submit a question/suggestion/comment in relation to our website or our services.
- Subscribing to our email newsletter.
- Applying to work with us. The type of information you may provide in your CV, a cover letter, your name, address, e-mail address and phone number. CVs should include information relevant to your employment history and education (degrees obtained, places worked, positions held, relevant awards, and so forth). We ask that you do not disclose sensitive personal information (e.g. gender, height, weight, medical information, religion, philosophical or political beliefs, financial data) in your application.

- Using our website. Every computer connected to the internet is given a domain name and a set of numbers that serve as that computer's 'Internet Protocol' IP address. When a visitor requests a page from www.wlr.ie, our web server automatically recognises that visitor's domain name and IP address from which you have accessed our site. We use this information to examine our traffic in aggregate, but do not collect and evaluate this information for individuals.

## **What information about you do we collect from others?**

When you use our services, we may obtain the following categories of personal data from others:

- Government Departments & Agencies where you are referred to our service;
- An Gardai Siochána when we carry out Garda vetting.

## **We may also collect, store and use the following “special categories” of more sensitive personal information:**

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.

## **Why do we collect this information?**

We collect the information in order to provide you with our services, to market our services to improve our website and to recruit staff.

We will use this information:

### ***Service User:***

- To establish if you are eligible for programme supports;
- To set you up as a Service User on our systems;
- To liaise with you about projects that we are undertaking with you;
- To register you for programme supported - courses;
- To share your name and contact details with other service providers, as agreed with you, so we can make referrals and appointments on your behalf;
- To provide you with information on upcoming courses, workshops and events that may be of interest to you;
- To review how we assisted you so we can provide you with the best possible tailored supports;
- To contact you to provide ongoing and follow up supports as part of our service delivery;
- To provide information to the Department of Employment Affairs and Social Protection, Department of Rural & Community Development, Limerick City & County Council, Pobal & HSE as relevant about the nature and outcome of your engagement with the service;
- To contact you to provide ongoing and follow up supports as part of our service delivery;
- To produce statistics on programme outcomes which will help us plan and improve our services;
- To facilitate any audits on our services/programmes by our funders;

**Candidates:**

- To create a candidate profile for you if you are a prospective employee;

**Website users:**

- To administer and improve our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- As part of our efforts to keep our website safe and secure;

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

- That you have provided consent for the processing;
- 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 the purposes of the legitimate interests which we pursue where such interests are not overridden by your interests or fundamental rights or freedoms which require the protection of your information.

**The legal bases for the processing of your special category data or sensitive data (for example Garda Vetting) are:**

- That you have provided consent for the processing

**Who do we share your information with?**

We may share your data with Third Parties in order to arrange follow up appointments or referrals to other service providers (e.g. Education and Training Board, Citizen's Information Centre).

For services and programmes where we are the Data Processor (e.g. Jobs Club, Tús, Rural Social Scheme), we will share your data with the Data Controller (Department of Employment Affairs and Social Protection)

For services and programmes where we are the Data Controller (e.g. Social Inclusion and Community Activation Programme, Primary Healthcare Programme for Travellers), we may share your data with third parties in order to arrange referrals to other services. We will only do this with your consent. We may also share your data with our funders for audit and monitoring purposes.

We may share aggregate information about our website users to third parties but will not share any personally identifiable information about you without your express consent. For example, we might inform third parties regarding the number of unique users who visit our website, the demographic breakdown of our community users of our website, or the activities that visitors to our website engage in while on our website.

We will not disclose your Personal Data to third parties unless you have consented to this disclosure or unless the third party is required to fulfil your request (in such circumstances, the need for disclosure to a third party will have been notified to you at the time your data is collected and that third party will be bound by similar data protection requirements). We will disclose your Personal Data if we are under a duty to disclose or share your information in order to comply with any legal

obligation, or in order to enforce or apply our terms of use and other agreements; or to protect our rights, property, or safety, our customers, or others.

## **DISCLOSURE OF YOUR INFORMATION**

We may also share your information with selected third parties including:

- Auditors, suppliers and sub-contractors for the performance of any contract we enter into with them or you

*We attach at Schedule 1 a list of all entities with whom your personal data is shared.*

## **How long do we keep hold of your information?**

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. For further information on the periods for which your personal data is kept, please contact us for a copy of our data retention policy.

## **Do we transfer your information outside the European Union or the European Economic Area?**

No.

## **What are your rights with respect to your personal data?**

You have the following rights:

- The right to access the personal data we hold about you.
- The right to require us to rectify any inaccurate personal data about you without undue delay.
- 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.
- The right to object to us processing personal data about you such as processing for profiling or direct marketing.
- 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.
- The right to request a restriction of the processing of your personal data.

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.

You may exercise any of the above rights by contacting [dataprotection@wlr.ie](mailto:dataprotection@wlr.ie).

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 Commission. The website is [www.dataprotection.ie](http://www.dataprotection.ie).

When you become our customer the processing of your information, and/or that of your team who you nominate to liaise with us, will become a condition of the contract between us as we require certain information in order to be able to provide you with our services (e.g. contact information). In those circumstances, if you do not provide your information when requested, we may be unable to provide our services to you.

## **Security**

Your Personal Data is held on secure servers which are hosted by us for up to 7 years. The nature of the Internet is such that we cannot guarantee or warrant the security of any information you transmit to us via the Internet. No data transmission over the Internet can be guaranteed to be 100% secure. However, we will take all reasonable steps (including appropriate technical and organisational measures) to protect your Personal Data.

## **What will happen if we change our privacy statement**

By using the [www.wlr.ie](http://www.wlr.ie) website, you consent to the collection and use of information by us as specified above. If we decide to change our Privacy Statement, we will post those changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it.

## **How can you contact us?**

Our Data Protection Contact can be contacted:

By phone: 069 62222

Address: St. Marys Road, Newcastle West, Co. Limerick.

Or by email: [dataprotection@wlr.ie](mailto:dataprotection@wlr.ie)

## Schedule 1\*

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

<i>Services provided</i>	<i>Third party</i>
Programme Supports	Department of Employment Affairs & Social Protection. Department of Rural & Community Development. Pobal HSE. Limerick Community Development Committee Limerick City & County Council
Cloud Service Providers	Microsoft 365, Mailchimp for email and newsletter communications
Archive/shredding companies	DGD Papers Ltd.
IT Service Providers	Microireland Ltd.
Website Design & Hosting	Arra Webdesign, Blacknight Internet Solutions
Garda Vetting	An Gardaí Síochána

\* This schedule is subject to change and will be updated periodically