



# The Hygiene Bank Ireland Privacy Notice

## Purpose

The purpose of this Privacy Notice is to set out what personal data The Hygiene Bank Ireland will collect and for what purposes, to comply with current data protection and privacy laws.

## Scope

This privacy notice applies to The Hygiene Bank Ireland, operating in the Republic of Ireland only, and explains how we will use the personal data supplied to us by our supporters or other parties.

## The legal reason for processing personal data

The legal reason for processing your personal data will depend upon the circumstances in which it is being collected and used, but will fall into one of the following categories:

- Where the processing is necessary to carry out a contractual relationship (e.g. as a referral agent, a client in receipt of our services or a contractor carrying out work on our behalf)
- Where the processing is necessary in order for us to comply with a legal obligation (e.g. when a supporter signs up as an official volunteer)
- Where it is in our legitimate interests to perform our functions (e.g. processing donations or sending administrative communications where our legitimate interest is to deliver our charitable purposes).
- Where you have provided your consent to allow us to use your personal data in a certain way (e.g. if you have opted to receive regular updates about our work)

The legitimate interests of The Hygiene Bank Ireland include providing the immediate benefits that the charity provides to individuals through its work supplying hygiene products, and the wider benefits this brings to society.

## How we collect your personal data

We collect personal data in the following ways:

- When you give it to us directly (eg. signing up to our newsletter, working as a volunteer or other supporter, or a partner), or
- When you give other parties permission to share your personal data with us (eg. donating via a fundraising page).

## What personal data we collect

Your personal data will only be used in a way that you would reasonably expect of a charity, or have explicitly agreed to. The type and quantity of personal data we collect and how we use it depends on why you are providing it.

- When you make a donation via a fundraising page you will opt in to the types of personal data you share with us. This could include your full name, email address and phone number. This does not include any bank details. In line with [iDonate's Privacy Statement](#), The Hygiene Bank Ireland will not use your personal data for marketing purposes unless you have opted in to this when donating.
- When you sign up as a volunteer or partner, we will collect your name and contact details so that we can help you support the charity.

Cookies placed on your browser will also be processed by THBI, but you will be offered the opportunity to minimise the extent of these cookies.

## How we will use your personal data

How we use your personal data will largely depend on your relationship with us and why you are providing it. We may use it to:

- Fulfil your requests and to give you the information, support or services you ask for.
- Keep a record of your relationship to us, details of any contact or communication which we have with you and to comply with our administrative duties and financial regulations.
- Process donations and other financial payments, including sending thank you letters and receipts.
- To claim tax back on your donation in line with the [Revenue Charitable Donation Scheme](#).
- Carry out statistical analysis in order to develop our organisational strategy and help us to understand how we can improve our services and meet the needs of people that require our help.
- Investigate and respond to complaints, legal claims or other issues. At times, we may need to use your personal data to prevent fraud or to identify misuse of our services.
- Monitor and record information on contractors and volunteers for the purpose of recruitment, payment for contractual services, safety and performance management.
- We may also use your personal data for other purposes which we will specifically notify you about and, where appropriate, obtain your consent.

We understand many donors like to make donations anonymously so we will not disclose their names unless we have the donor's permission to do so.

## Direct Marketing

Continued support to The Hygiene Bank Ireland helps thousands of people in crisis get access to vital hygiene provisions at a time when they need it most. With your consent, we would like to keep you informed of our news, information, fundraising events and campaigns so we can continue to raise income and awareness of the charity.

We offer you the option to tell us what type of information you would like to receive and how you prefer to hear from us; by post, email, phone or SMS. If you choose for us to contact you by email, every message we send will include a link to enable you to change your preferences or to opt out of receiving future marketing messages.

## Who we may share your personal data with

We never sell any of your personal data to any organisation for any reason. We do not use your personal data in any automated decision-making or automated profiling activities. We will share your personal data with another party for one or more of the following purposes:

- Irish Revenue – to make claims on tax back
- Banks or other payment providers – to authorise or make transactions
- Financial and legal advisers in the event we need to obtain advice and protect or defend our legal rights
- Law enforcement bodies in order to comply with any legal obligation or court order, or which we reasonably believe that we need to disclose your personal data to for such purposes

We will share personal data with the following parties only with your consent, which you can withdraw at any time:

- WhatsApp for the processing of communications with volunteers.
- iDonate for the processing of donations.

Donations made through the iDonate website will involve iDonate processing personal data, on behalf of THBI. Communications through the WhatsApp application will involve WhatsApp processing personal data, on behalf of THBI. iDonate and WhatsApp will act as the controllers of this personal data, and THBI will have no control over the processing, international transfers, nor security arrangements over this personal data. In order that these services can be used lawfully, consent will be required before use.

## How long we will keep your personal data

How long we keep your personal data will depend on your relationship with us and the reason why you are providing us with your personal data. If you are providing your personal data to us as a volunteer or corporate supporter, we will keep it only for as long as you continue to give us your time and support. If you decide that you are no longer able to volunteer with us or provide us with your support, then we will delete your personal data no later than 30 days after we receive notice that you are withdrawing your support.

If you are providing us with your personal data as a financial donor, we will keep your data for as long as you continue to give us your financial support and as required to operate our services in accordance with legal, tax and accounting requirements. This will be a period of no longer than 7 years after the donation. Where your personal data is no longer required, we will ensure it is disposed of in a secure manner.

## How we protect your personal data

We place great importance on keeping your personal data secure, accurate and up-to-date.

We have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control. While we cannot ensure or guarantee that loss, misuse or alteration of data will never occur while it is under our control, we use our best efforts to try to prevent this.

We protect your personal data by:

- Making sure that only the people who are authorised to use the personal data can access it
- Making sure that personal data is accurate and used only for the purposes as intended
- Making sure that individuals have a right to access their own personal data held by The Hygiene Bank Ireland.

Our website and social media pages may contain links to other websites, run by other organisations, which we do not control. This policy does not apply to those other websites, so we encourage you to read their privacy policies. We are not responsible for the privacy policies and practices of other websites (even if you access them using links that we provide) and we provide links to those websites solely for your information and convenience. Your disclosure of personal data to third party websites is at your own risk.

In addition, if you linked to our website from a third party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the policy of that third party website.

## Your rights regarding the personal data we hold

You have the right to request a copy of the personal data we hold about you and details of how we use that personal data (called a Data Subject Access Request). If you think any of the personal data we hold about you is inaccurate, you may also request that it is corrected. You also have a right, in certain circumstances, to require us to stop processing your personal data and for us to erase the data we hold about you.

Please email [headoffice@thehygienebank.ie](mailto:headoffice@thehygienebank.ie) to exercise any of these rights

Further details about how we process your personal data is available in our Privacy Policy which is available by sending an email to [headoffice@thehygienebank.ie](mailto:headoffice@thehygienebank.ie).

If you have concerns about how we process your personal data you can make a complaint to the Data Protection Commission at <https://forms.dataprotection.ie/contact>.

### Revision history and next review

Policy Document:	Privacy Notice
Date of Next Review	March 2021
Version:	1.0
Approved by, Date:	Tom Poynter 09-May-2021
Last Reviewed:	N/A

Signed:

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Chair of the Board