

### **Privacy Policy**

We take your privacy – and our responsibility to you – seriously.

St James's Hospital Foundation is committed to protecting the personal information of everyone who shares their information with us in the course of our work. This Privacy Statement sets out how we collect, use and sore your personal information, (this means any information that identifies or could identify you). We want our supporters and those that we support to have confidence in how we collect and process any personal information shared with us.

We ensure all data gathering and processing activities are carried out in compliance with legal requirements and with our organizational values and principles. The EU General Data Protection Regulation (GDPR), which aims to strengthen data protection for everyone in the EU, came into force as the new data protection framework on 25th May 2018 and introduced changes in relation to the way that organisations based in the EU, including St James's Hospital Foundation, collect, store and use personal data. St James's Hospital Foundation is, for the purpose of the GDPR, the data controller and can be contacted at the e-mail or postal addresses below. This policy will be reviewed by our Team and Board regularly and updated.

### Who we are

The role of the Foundation is to facilitate and attract private investment to support the work of the Hospital. Donations to the Foundation are used to enhance facilities, support, innovation and research, provide education and training for hospital employees and elevate the standard of care for all patients.

The Foundation also manages research funds on behalf of researchers at St James's Hospital. It is committed to creating an environment in which education and research in the health science and allied areas flourishes for the betterment of patient care.

## Address:

St James's Hospital Foundation St. James's Hospital James's Street Dublin 8 Telephone: (01) 428 4086 Email: ask@supportstjames.ie St James's Hospital Foundation Charity No. CHY 7269 CRA Registered Charity No. 20015374

## Contact details for DPO: dpo@supportstjames.ie

## Your Information – what we collect, why and how we use it:

The Personal Information we collect includes details such as your name, email address, postal address, telephone number and credit/debit card details. St James's Hospital Foundation collects information from the public in several ways. For example, we ask for contact and other information when members of the public engage with our campaigns, contact us, or attend a St James's Hospital Foundation event. We use this information to keep you informed about other events which may be of interest to you, to help improve our services and to keep a record of our communications with you.

If you are a financial supporter and send us a donation by post or online or make a regular contribution to St James's Hospital Foundation through your bank account or credit card, we will ask for information that enables us to effectively administer your donation. This will generally include your name, contact information such as address, email or telephone number, your payment details and whether you wish St James's Hospital Foundation to claim tax paid on your donation. We also ensure that, if you are setting up a regular donation to St James's Hospital Foundation

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either through your bank account or giving by credit card, that you are 18 years or older by asking for, and keeping a record of, your year of birth.

We send invitations to carefully selected individuals and organisations throughout the year to attend and participate in events which are relevant for professional development, networking or to fulfil their CSR programme. If you have requested information about a job or volunteering opportunity with St James's Hospital Foundation, we collect that information so that we can fulfil your request.

If you request information about one of our services or projects by phone, website or in our advice and information centre, we collect this information so that we can make sure you receive the help you need.

### What do we use your information for?

We use information for several purposes including:

Fundraising Awareness-Raising Advocacy and Campaigning Financial procedures / Processing transactions Marketing Human resources and recruitment

### **Sensitive Personal Information**

We will take extra precautions to safeguard any sensitive personal information we process or store on your behalf. We will treat this with the upmost of confidentiality and in accordance with this privacy policy. Data Protection legislation recognises that some categories of personal information are more sensitive. Sensitive personal information can include information on people's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs. We will only process this information to deal with your enquiry or for training and quality monitoring or evaluating the services we provide. We will not share your information with anybody without your express permission except in exceptional circumstances. Examples of this may include self-harm, or threat to others or in situations of child protection issues such as physical abuse or exploitation

## How long do we store your information?

## Financial Supporters of St James's Hospital Foundation

These are supporters that help or have helped us with financial gifts. A supporter's pattern of giving can often change over time. We have found that our financial supporter's cycle of giving is on average 6 years. That means the supporter may, during this period, stop providing financial support, at certain times. This can be for a wide number of reasons, including because they choose to support us in a different way. Irrespective of their financial circumstances, these supporters still hold the same principles and values; and continue to be connected to St James's Hospital Foundation and our mission. This is evidenced by the fact that many of this group of supporters restart their regular gifts and give in other ways, within 6 years from their last donation.

We store financial records of donations for a period of 7 years, as required by Revenue for audit purposes. If a donor has requested to have their contact details removed before this date, this financial information is anonymised where possible.

For those who so generously pledge a gift in their Will to St James's Hospital Foundation we will maintain a record of your details indefinitely as proof of your support in case the Will is contested. We will not retain your data for this purpose if do not want us to or if you have asked for the data to be erased.

If you are a legacy pledger and we have not heard from you in 6 years, but you have not opted out of marketing, we will not contact you for marketing purposes beyond this point however we will keep this legacy information solely for the purposes of proof of a legacy gift being made.

## Supporters who inform us that they are leaving a donation in their Will to St James's Hospital Foundation.

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Some of our most dedicated supporters make the decision to, after their loved ones are provided for, leave a charitable bequest in their Will to St James's Hospital Foundation and then inform us of their intention. To make sure that we communicate with these supporters in an appropriate way, for example refraining from sending them further information about charitable bequests, we keep a record of their information unless they inform us otherwise.

Supporters demonstrate their support in several ways and so could be in more than one, or even all, of the above categories. We will review and update this these categories and the timescales on a rolling basis to ensure that, as times and needs change, we continue to do the best by our supporters and the customers whom we help every day.

# Legal basis for using your information

We process all personal data lawfully, fairly and in a transparent manner. We take a personalised approach to communications and hearing from us. We adhere to the relevant GDPR articles in relation to processing your data. This is necessary, proportionate, and carried out in the least intrusive way to achieve our desired goal of serving our customers as efficiently and effectively as possible.

# We will only use your personal information if:

We have asked you and have a record of your express and recent consent for us to do so;

We have a 'Legitimate Interest' to do so to support our charitable purposes. Our use will be fair and balanced and never unduly have an impact on your rights.

We have a contract with you that we can only fulfil by using your personal information, e.g. to send you an item that you have requested or if you have signed up to participate in an event;

We have a legal obligation to obtain information about you, e.g. we are required by law to keep records of donations that we receive for 7 years according to Revenue.

We will not unduly prioritise our interests as a charity over your interests as an individual. We will always balance our interests with your rights. We will only use personal information in a way and for a purpose that you would reasonably expect. We promise to always be open and honest with you about your information and how it is used.

## What this means:

We believe that St James's Hospital Foundation's supporters are connected to our mission and want to know how they can continue to help us to achieve our goals. We think you are content for us to keep and use your personal information for the lengths of time specified below. If you would not wish us to follow these general guidelines, please contact us and let us know.

We will contact you with information and updates about our services and about how your support is helping. We will also contact you about ways that you might like to get involved or support us further.

This may be by post, email, telephone, or text message, according to your preferences. We will also continue to ask whether you are still happy to hear from us and in which ways.

# Emails

Some emails that we send have no tracking information, for example invoices for services that we have received. When specific consent for tracking has been provided by the data subject, for marketing, fundraising and advocacy emails, we can track at an individual level, whether the user has opened and clicked on the email. We do this to learn more about the kind of information that our supporters like to hear from us. We use this information to understand open and click rates on our emails to improve them.

If you want to unsubscribe from our emails, there is an unsubscribe option at the bottom of emails we send. You can also phone (01) 428 4086 or email <u>ask@supportstjames.ie</u> to unsubscribe at any time.

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It is always your choice. If you do not think this is right for you, you can tell us to change your communication preferences and our use of your information. You can do this at any time by phoning us on (01) 428 4086 or emailing ask@supportstjames.ie

## **Profiling and Data Analysis**

We like to learn about your personal motivation for supporting St James's Hospital Foundation and your experiences as a supporter. This helps us to give you the information about events, campaigns and services which are most relevant and important to you.

We may carry out research, segmentation and/or analysis of the personal information that you have provided to us and add publicly available information to help us tailor our communications to you, to better understand your preferences and to continue to find the most cost-effective ways to campaign, fundraise, raise awareness, and provide our services. This information is appended to the information

St James's Hospital Foundation analyses data in a responsible way, balancing the research and analysis we undertake with the privacy of our donors and supporters.

### Sharing your data

To make sure we are communicating, fundraising, and campaigning in the most effective way possible, we work with fully vetted service providers which may include fundraising agencies and marketing agencies, researchers, and direct mailing providers.

In some circumstances, it is necessary for St James's Hospital Foundation to give relevant staff at our service providers access to your personal information. This access is only granted to the extent necessary for them to perform their services for us. We require all service providers to comply with strict rules to protect the information you have given us.

St James's Hospital Foundation does not, and will never, share, sell or swap your information with other organisation for their own marketing purposes or commercial gain.

### Legal disclosure

We comply with requests for the disclosure of personal information in line with data protection legislation and best practice. This could include requests from law enforcement, Revenue, or tax agencies. In these circumstances, the request must be submitted in writing and in accordance with the relevant legal requirements. In certain circumstances, we may need to share personal data in our control with our insurers for insurance claims or with our legal counsel as per our legitimate interests and where processing is necessary for the establishment, exercise, or defense of legal claims.

### Keeping your information safe

We take looking after your information very seriously. We have implemented appropriate physical, technical and organisational measures to protect the personal information we control both on and off-line to prevent improper access, use alteration, destruction and loss. Your information is encrypted and stored securely on our servers in Ireland, which are maintained and updated by our CRM service provider MHance. If this information needs to go to an external supplier, for example, to process a donation through our website, this information is encrypted, transmitted securely and stored within the EU/EEA. We have strict agreements/contracts in place with all external service providers to ensure the highest levels of security and safety.

### Transfer outside of the EU/EEA

During our legitimate business activities St James's Hospital Foundation will from time-to-time transfer data outside of the EU/EEA (including to the United Kingdom). In such cases, we will have the appropriate transfer mechanisms in place as well as additional safeguards to protect that data as appropriate.

## Updated 05/01/2024 Web Forms

We at St James's Hospital Foundation guarantee our commitment to respecting and protecting your online privacy. This includes the personal information that you share with us via web forms on our website or our owned social media channels and online ads, e.g. if you respond to an ad on one of our social media channels, we will use the contact data you provide only to contact you about your specific area of interest or the particular event advertised.

# Your Rights

You have rights over your personal data, and you are in control of how your information is used. These rights are not absolute, and some qualifications and restrictions do apply. In summary your rights are: The Right to withdraw consent; Right of access; Right to rectification; Right to be forgotten / erasure; Right to restrict processing; Right to object; Right to refuse automated decision making and/or profiling; Right to portability. You also have the right to seek compensation through the courts if your data privacy rights have been infringed. If you believe your privacy rights have been violated, you may file a complaint with us or with the Data Protection Commissioners Office. https://www.dataprotection.ie/docs/Home/4.htm Contact Details for the Office of the Data Protection Commission Address: Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2 D02 RD28 Telephone: +353 57 8684800 / +353(0)761 104 800 / Lo Call No. 1890 252 231 Email: info@dataprotection.ie

# Changes to your personal information or preferences:

From time to time, we may contact you to ensure that the information you have provided us with remains accurate and up to date.

Should you wish to change your preferences you can do this any time:

By Post: St James's Hospital Foundation St. James's Hospital James's Street Dublin 8 By Email: ask@supportstjames.ie By Phone: (01) 428 4086