

# **Privacy Statement**

Approved by the Board

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# Introduction

The Community Foundation for Ireland (the **Foundation**) is a registered charity, established in 2001, engaged in donor services and grant making. For more information see www.communityfoundation.ie.

This document explains how we collect and use data your data and also explains your rights under the General Data Protection Regulation (GDPR).

#### Why we need to collect your data

One of the main aims of the Foundation is to promote philanthropic engagement by individuals and to do so in a way which addresses the strategic needs of the community and voluntary sector.

To promote and grow philanthropy we proactively seek out and engage with prospective donors, and supporters, so that we can connect the generosity of these donors and supporters with the energy, ideas and time of people in the community and voluntary sector.

As a consequence, we collect and process data on those who have given, or might do, financial (in the form of a donation) or other support to the Foundation.

Without the ability to promote philanthropy we would be unable to meet the strategic needs of the community and voluntary sector organisations that benefit from our grants.

We therefore collect and process this data on the basis that we have a **legitimate interest** to do so.

When receiving grant applications from community and voluntary organisations we collect and process data from the individuals working with those organisations. Without this data we could not effectively process these applications, provide funding to successful applicants or measure the effectiveness of our grants through our grant monitoring/outcome process.

We therefore collect and process this data on the basis that we have a **legitimate interest** to do so.

Where we process the data of individuals who maintain a Donor Advised Fund with the Foundation (Fund Owners and advisers to a fund), we do so to meet our contractual commitments as outlined in their fund agreement with us.

#### How we obtain your data

Much of the personal information we hold has been provided directly to us by you.

We may also collect data from referrals, i.e. where someone else provides your contact details to us in the belief that you may be interested in supporting the work of the Foundation.

And finally, we collect data from publicly available sources, typically news articles and online social media.

#### How we use your data

## Fund Owners (including advisers to a Fund), Donors and Supporters

We collect and process your data in order that we can do some or all of the Following

- Administer donor advised funds in accordance with your fund agreement.
- Process donations (and related tax relief) received into donor advised funds or into our own Community Foundation Ireland grantmaking funds
- Generally communicate with you regarding our philanthropic activities, including specific donor opportunities that may arise from time to time.

Typically, the information we process will include some or all of the following

- Your contact details i.e. name, address, email and phone details
- General information regarding your occupations, professional activity and networks
- Your preferences regarding how you wish us to maintain contact with you
- Your philanthropic interests
- Records of your transactions (donations, grants, fees) with us
- Information necessary for us to submit and process on your behalf, and with your prior approval, a tax relief claim in respect of your eligible donation(s).
- Information regarding our relationship with you including correspondence, meeting notes and attendance at events organised by the Foundation.



At all times we aim to only process information that we feel is appropriate and relevant given the nature of your relationship with us.

# **Grant Applicants**

In addition to processing information regarding the community and voluntary organisation applying for a grant we will also, by necessity, process data regarding the main contact person linked to that grant application.

Typically, the information we process will include some or all of the following

- Your contact details i.e. name, address, email and phone details
- Your preferences regarding how you wish us to maintain contact with you
- Any other data necessary for the assessment of a grant application
- A history of any grant application(s) made to the Foundation regardless of whether the application was successful. For successful grant applicants we will also gather data regarding the outcome of your grant.
- Information regarding our relationship with you including correspondence, meeting notes and attendance at events organised by the Foundation.

# How we protect your data Keeping your data secure

We keep your data secure in our database with appropriate security mechanisms in place.

This database is currently provided by a data processor located outside the European Economic Area (EEA) and therefore may not be subject to the same data protection laws as companies based in Ireland.

The database in question is a widely respected and trusted product in use globally by many organisations, large and small. We have a detailed contract with this supplier and we will take all reasonable steps to ensure that they provide an adequate level of protection in accordance with GDPR.

### Sharing Your Data

We do not share your data with anyone else or any other organisation <u>unless it is necessary</u> for the purpose for which you have given us the data.

For example, we may share details of your grant application with a panel of external assessors who assist us in selecting the most appropriate grant applications from a grant round.

In our annual report we list details of every grant made by the Foundation during the relevant calendar year. These details are limited to the recipient organisation, the amount of the grant paid and a brief description of the purpose of the grant.

In certain circumstances we will seek your specific permission to share your data.

For example, you may agree to sharing grant details with individual donors whom we believe could have an interest in issues being addressed by your grant application.

Where you have completed the necessary tax documentation, we will share your donation and tax details (PPS Number) with Revenue Commissioners for the purpose of claiming tax relief on your eligible donation(s).

#### How long we keep your data

We will keep your data for as long as is needed to complete the purpose for which it was originally processed. However, in certain circumstances we will be required by law to retain your data for a longer period of time.

In general, so long as we maintain an ongoing relationship with you, in whatever form, we will continue to retain your data.

At any point you may request details of this data and you may also request us to delete this data. Unless we are required by law to retain your data, in practical terms we will generally respond to your request by either supressing or anonymising your data.

Supressing your data in effect 'archives' your data. Not only does this ensure that we will not actively process your data, it also ensures that we do not inadvertently re-add you to our 'active' database against your wishes.

In circumstances where your data includes financial transactions e.g. donations, anonymising your data allows us to keep a record of that transaction (your name and donation amount) while deleting all other data we hold.

# Your Rights

Under GDPR you have a number of rights in respect of your data and how we process it.

- Where our use of your data requires consent, you may withdraw your consent at any time.
- Where we rely on Legitimate Interest to process your data, you may ask us to stop doing so.
- You may request a copy of the data we hold for you.
- You may change or stop the manner in which we communicate with you or process data about you and, if it is not required for the purpose you provided it, then we will do so. Examples of where we may continue to process your data might include an obligation on us arising from our fund agreement with you or an obligation on us arising from the processing of tax relief on a donation.
- If you are not satisfied with the way we have processed your data we would like to hear from you directly so that we may address your concerns. However, at any time you have the right to complain directly to the Data Protection Commissioner.

#### Contacting us

If you have any questions or concerns regarding this privacy notice, about the manner in which we process your data or you simply wish to update your communication preferences i.e. how and about what we contact you, you can advise us in a number of ways

- By email at info@foundation.ie
- By phone at + 353 (01) 874 7354
- By post at Finance Manager, 30 Merrion Square North, Dublin, D02 VE40