



Cuidiú Privacy Policy

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Head Office: Carmichael House, North Brunswick Street, Dublin 7.

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Introduction

Cuidiú's motto is 'Education and Support for Parenthood'. Our aim is to provide support and education to parents for parenthood. We empower parents by providing them with knowledge and support to make informed choices through all stages of parenthood from pregnancy to early childhood and teenage years. This support is provided through childbirth education, postnatal support, breastfeeding support and parent to parent support delivered through one to one support, support groups, educational talks and family-oriented activities such as parties and outings. We also provide training to volunteers in the areas of Breastfeeding Support, Parent to Parent Support and Antenatal Teacher Training.

The purpose of this document is to provide a policy statement regarding the Data Protection and Privacy obligations of Cuidiú. This includes obligations in dealing with personal data, in order to ensure that the organisation complies with the requirements of the relevant Irish legislation, namely the General Data Protection Regulation (GDPR) 2018, the Irish Data Protection Act (1988), and the Irish Data Protection (Amendment) Act (2003).

Scope

This Privacy Policy applies to all the services and websites offered by Cuidiú CLG. We refer to those services and websites collectively as the "services" in this policy. Unless otherwise noted, our services are provided by Cuidiú CLG.

Services include, but are not limited to: our national and regional websites, support groups and events, surveys, newsletters, online support groups, etc.

References to 'data' in this Privacy Policy will refer to data you allow our services to collect in order to provide that service, for example event attendance data, membership data, survey responses, data collected in a form, or data inserted on our website. Reference to 'personal information' or to 'information', means information about you personally that we collect or for which we act as custodian.

Cuidiú's data controller is the Cuidiú Data Protection Officer: dataprotection@cuidiu.ie or see <http://www.cuidiu.ie/dataprotection> for details.

Policy Statement

This Privacy Statement provides information about the ways in which Cuidiú process the personal information provided to us.

1. Who Are You?

We refer to 'you' a lot in this Privacy Policy. To better understand what information is most relevant to you, see the following useful definitions:

- **Family Member**

You subscribe to Cuidiú Family Membership to be part of Cuidiú services. You interact with Cuidiú by either directly creating a Family Membership online, by using branch Family Membership forms, event attendee sheets or conference questionnaires.

- **Cuidiú Volunteer**

You subscribe to Cuidiú Family Membership to be part of and contribute to certain Cuidiú services. You complete a Cuidiú training course organised by Cuidiú in order to volunteer with Cuidiú, you join your local committee or you host an event. You interact with Cuidiú by directly creating a Family Membership online, by using branch Family Membership forms, through event attendee sheets, training application forms, sector activity audits or conference questionnaires.

- **Panel Member**

You have signed up and agreed to become a member of any one of the Antenatal, Breastfeeding or Parent to Parent Panels on behalf of trained volunteers in that sector.

- **Board Director, Administration Council Member and Legal Member**

You have signed up and agreed to become a Member of either the Board of Directors, the Administration Council and/or a Legal Member on behalf of Family Members and Sectors.

- **Respondent**

You have received a survey, form, training application, or questionnaire deriving from Cuidiú.

2. Information We May Collect About You

- **Registration information**

You need a Family Membership before you can train as a Cuidiú Volunteer or before you host one of Cuidiú's events or services. Cuidiú would prefer that you have a Family Membership when using SurveyMonkey. When you register for a Family Membership, we collect your name, address, and email address. We also ask about your geographical region, what branch you are in and if you have trained as a Cuidiú volunteer.

If you make a payment to Cuidiú for Family Membership, you can either pay in cash at an event in which case, no billing data is maintained, or via PayPal if you pay online in which case payment details are maintained by PayPal.

- **Event Attendee Information (e.g. name, phone number and/or email address)**

You provide us with your contact information, whether through use of our services or event attendance, an interaction with Cuidiú Volunteers or a response to one of Cuidiú's surveys or audits.

- **Trained Volunteers, Panel Members, Directors, Administrative Council and Legal Members**

We do not collect any additional Membership data for Volunteers, Panel Members, Directors, Administrative Council and Legal Members above what we collect for Family Members (with the exception of Directors who are required to submit a copy of their passport/driving licence as identification to be registered by the Company Secretary). However, if you submit expense forms we will need your IBAN and BIC bank details on the completed form in order to make payment to you.

- **Breastfeeding/P2P/Antenatal Training Application Data**

When you sign up for our training courses you are asked to provide us with information about yourself and to give us more detailed insights into who you are.

On our Breastfeeding and Parent to Parent annual audit forms, you are asked if you want to log an experience on a register maintained by one Panel Member in each Sectorsur. It is implicit in providing this information that it will be used to access support as needed. Permission is sought by the coordinator each time before contact information is passed on to a mother.

- **Directors and Administrative Council Applicants**

When you apply to join the Board or Administrative Council you are asked to provide us with information about yourself and to give us more detailed insights into who you are including your skillsets.

- **Submitted Expenses**

If you have submitted an expense to be reimbursed to you or an invoice for payment, we will require your bank details in the form of your IBAN and BIC code.

- **Survey data**

We use Survey Monkey to collect and store your survey data: questions and responses are for Cuidiú use only. Anonymised summary data may be shared with HSE in relation to our Breastfeeding Sector. Anonymised data may be shared by Parent to Parent Sector in relation to grant applications.

- **Website Log Data**

Like most websites today, our web servers keep log files that record data each time a device accesses those servers. The log files contain data about the nature of each access, including originating IP addresses, internet service providers, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system versions, device type and timestamps.

Cuidiú's website uses Google Analytics, a web analytics service provided by Google Inc. ('Google'). Google Analytics uses 'cookies' which are text files placed on your computer, to help the website analyse how users use the site.

- **Consent Forms**

If you attend an event at which pictures are taken, we will ask for your consent to take and store these pictures. **NB This procedure is being worked on and will be put into practice in early 2019.**

- **Donation**

If you make a donation on our website using Paypal, we collect your name and email address but payment details are maintained by PayPal. If you make a cash donation at an event your name and contact number may be recorded but no billing information is collected.

- **Other Information**

You might voluntarily provide us with some of your family information, location, detail and opinion of your volunteering experiences, Family Membership status.

3. Why We Collect the Information

To provide our services to you we must collect certain data, including personal data. We process personal data about you, with your consent, so that we can fulfil our contractual responsibility to deliver the services to you and pursue Cuidiú's legitimate interests as listed below.

We have undertaken to ensure that we place clear limitations on each of these uses so that your privacy is respected and only the information necessary to achieve these legitimate aims is used. Our primary goal is to improve upon and make sure our services and messaging are relevant for all our users, while also ensuring that personal information of all users is respected and protected.

- **Maintaining Records for Insurance**

For insurance purposes event attendance sheets must be maintained for a period of 2 years.

If there is an incident at an event, an incident report form must be completed, this should include the injured party's name and address and in the case of a child, the child's name and date of birth, parent's name and address. The form and relevant event attendance sheet may also need to be retained for a longer period of time, in case of a claim.

- **Maintaining Records for Audit**

As per company legislation, we must keep 6 years plus the current year's financial information. That is 7 years in total.

The auditor needs all of the documentation that supports and links the financial entries.

- **Improving Service Experience – Survey Respondents**

Cuidiú will periodically request members of the various sectors to complete a survey regarding the services they provide. The aim of this is to document the services provided and looks for areas of improvement.

As a survey respondent, we only use contact information to respond to an inquiry which you submit to us. Other responses and information supplied are used for support, training and planning purposes. Some surveys are necessary for complying with the requirements of staying active as a trained volunteer.

We use information about how you use our services to improve our services for you and all users. As a general survey respondent, we only use contact information to respond to an inquiry which you submit to us. Other responses and information supplied are used for support, training and planning purposes. For trained volunteers, some surveys request necessary information around compliance with the requirements of staying active as a trained volunteer. Sector Tutors and Panels will follow up with this information.

The survey data will be aggregated and anonymised so we can analyse the data. We collect and use all this data for our legitimate interests like helping us improve the experience for Cuidiú users and volunteers. If a survey is issued by a particular sector to trained volunteers/volunteers in training sectors may follow up with a response.

Family Member and Respondent trust is paramount to everything we do and so when we do use data provided by Respondents, we put Family Members and Respondents first. When we do analysis of response data we only do so once we have ensured the anonymity of individual respondents (by aggregating and anonymising the data).

Our goal is to improve the user experience across Cuidiú services while maintaining the confidentiality and privacy of responses.

- **Website Visitor**

We do not process personal data about website visitors, however we do utilise tracking cookies via Google Analytics in order to understand how visitors use our website.

- **Legal uses**

To respond to legal requests or prevent fraud, we may need to use and disclose information or data we hold about you. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

4. How We Store the Information

We store data in the following formats:

Database, website CMS, membership forms, event attendee sheets, survey data (Survey Monkey), excel spreadsheets and Google docs. This data may also be emailed via Gmail.

- **Membership Data**

Members' data is stored in a password protected database and is accessible to authorised Cuidiú volunteers. Passwords are stored in encrypted format. Details of members are shared with local membership secretaries via Cuidiú Gmail accounts.

Membership forms are stored for audit purposes. They are stored in hard copy format by local membership secretaries and transferred quarterly to a National storage location. Soft copy forms are stored on Cuidiú Gmail accounts. Where members pay online via PayPal, we store the members details, and the transaction details including timestamp, amount, transaction ID and card information remains with PayPal.

- **Event Attendance Data**

Event attendance forms are stored for audit and insurance purposes. They are stored in hard copy format by local hosts who pass to their local Treasurer. They are then transferred quarterly to a National storage location. Soft copy forms are stored on Cuidiú Gmail accounts.

- **Volunteer Data**

Panels will store certain information (applications and personal data) about applicants for, qualified and trainee Antenatal Teachers, Breastfeeding Counsellors and Parent to Parent Supporters in dedicated panel folders and computer files.

5. Safety of Minors

Our services may only be used by adults who take full responsibility for any minors in their company. "Minors" are individuals under the age of 16. Cuidiú does not collect personal data from Minors, unless required in the event of an incident at an event. In the event of an incident involving a minor occurring at an event, the details of that incident will be recorded in an incident form for insurance purposes and will include the name and date of birth of the minor.

6. Changes to our Privacy Policy

We will make changes to this Privacy Policy from time to time as necessary. We will identify the changes we have made when doing so. In circumstances where a change will materially alter the way in which we collect or use your personal information or data, we will send a notice of this change to all of our Family Members.

7. Personalised Marketing/Electronic Delivery of Newsletter

You can opt-out from direct contact, i.e. newsletters from Cuidiú or marketing of Cuidiú events in your Family Membership. We provide opt-out options in all direct emails from Cuidiú.

8. Disclosure to Third Parties

Cuidiú do not give your personal data to any external or third parties.

We utilise the following third-party providers and their GDPR policies can be found in the links below:

- **Facebook**

Many local branches have their own Facebook groups and pages. These are used for areas such as: providing information on support groups and events occurring in the local area.

<https://www.facebook.com/privacy/explanation>

<https://www.facebook.com/business/gdpr>

We also utilise WhatsApp chat groups to organise events and meetups in certain areas.

WhatsApp is a Facebook company.

<https://www.whatsapp.com/legal/?eea=1#privacy-policy-information-we-collect>

- **Google**

Email, data storage

<https://cloud.google.com/security/gdpr/>

<https://privacy.google.com/businesses/compliance/>

<https://cloud.google.com/security/compliance/gdpr/>

- **Survey Monkey**

We utilise Survey Monkey to collect data and feedback on the services we provide

<https://www.surveymonkey.com/mp/legal/privacy-policy/>

- **ILIKECAKE**

ILIKECAKE provide website design service and have access to website data, including underlying membership data.

- **Hosting Ireland**

Hosting Ireland are our website hosting provider, with access to website data, including underlying membership data.

<https://www.hostingireland.ie/privacy-policy.php>

- **PayPal**

Where members join using our online facility, we use PayPal to handle the payment.

<https://www.paypal.com/ie/webapps/mpp/ua/privacy-prev>

9. Who is my Data Controller?

The Cuidiú Data Protection Officer can be contacted at: dataprotection@cuidiu.ie.

10. Your Rights

You have certain legal rights to obtain information about whether we hold personal information about them, to access personal information we hold about them, and to obtain its correction, update, amendment or deletion in appropriate circumstances. Some of these rights may be subject to some exceptions or limitations. We will respond to your request to exercise these rights within a reasonable time (and in all cases within 30 days of receiving a request).

Exceptions and limitations: Due to legal requirements (audit and insurance)

For insurance purposes a copy of event attendance sheets and membership data must be maintained for 2 years. This is because sign in sheets are a record of who attended the event should an accident occur, as well as the membership status of the host. Membership is required for a host to be covered by Cuidiú insurance and a record of that membership status would be required should an accident occur.

For audit purposes event attendance data must be maintained for 7 years. Sign in sheets serve as evidence of how much money was collected at an event, and from whom.

Rights which you are entitled to are:

- Data access rights
- Right to restrict processing – this is fulfilled by the right to opt out (only applies to future processing)
- Right of Rectification
- Right to Erasure (Right to be Forgotten) – once audit and insurance requirements have been fulfilled
- Right to object to processing – can opt out.
- Right to withdraw consent – limited – similar to right to restrict processing / opt out - only applies to future due to audit and insurance purposes

11. Exercising Your Rights

Our Contact Information for Privacy Inquiries - Cuidiú Data Protection Officer:
dataprotection@cuidiu.ie

12. Complaints

If you are resident in the European Union and you are dissatisfied with how we have managed a complaint you have submitted to us, you are entitled to contact your local data protection supervisory authority, under the remit of the Irish Office of the Data Protection Commissioner (see: [ODPC Website](#)).

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