

Introduction and Purpose of the Document

This Privacy Policy describes the manner in which the non-profit organisation The Fáilte Centre, hereinafter referred to as "Failte" or "we" based in Athens, Greece, processes your personal data.

In order to provide our Services, we may need to process **personal data** (that is information about someone who can be identified from the data) from time to time. This personal data may be about you or other people.

For any questions you may have about processing your data, feel free to contact us at: claire@thefailtecentre.org or colleen@thefailtecentre.org.

About The Fáilte Centre

The Fáilte Centre takes its name from "Fáilte," the Irish word for "welcome." Fáilte (pronounced *FAHL-chuh*) emphasises our core approach: we welcome all individuals regardless of age, gender, background, nationality, political orientation or religion.

Our mission at The Fáilte Centre is to provide both individualised learning opportunities as well as mental health & psychosocial support (MHPSS) services in a welcoming and caring environment.

Data Collected and Purposes of Collection Section

Whose Data Does Fáilte Collect?

Newsletter recipients and website visitors

When registering for our newsletters through our website, consent is given to receive newsletters. For newsletter registration, the information saved includes the name and contact information (i.e. e-mail) as well as of the recipient.

Visitors have the option to consent to cookies used on the website (see below for full cookie explanation). General visitor data, such as the most commonly requested pages, are recorded on our website.

Private donors

Contributors/donors register the information themselves, as a regular donor or one off donation, through the Chuffed fundraising platform, Paypal or as a direct bank transfer.

Institutional donors

In order to process Memoranda of Understanding (MoU) with our partners and to fulfil tax or other legal obligations, we may retain the following:

- Basic identification data
- Unique identification Data (Tax number)
- Contact information (i.e. names, telephone number, e-mail)
- Finance information (e.g. bank account details)

Volunteers (including long-term volunteer positions)/interns:

Prospective volunteers applying through e-mail will submit a CV and cover letter that includes information such as:

- Name and surname
- Age/date of birth
- Contact information (e.g. telephone number, e-mail)
- Emergency contact
- Nationality

- Gender
- Previous education/employment/volunteer history

Information is stored from the applicants' e-mail application. Information of applicants who move forward and are selected for an interview may be stored in the organisation's Google Drive. This will be stored for a limited time not exceeding five years. Selected candidates provide references prior to being hired.

When a volunteer is accepted they are asked to provide a copy of their identification and if relevant, visa, as well as a copy of their criminal background check. This information is recorded in our e-mail system and in our Google Drive for a limited period of time not exceeding one year after the departure of the volunteer. We may also receive volunteer applications and information from third-party sites. Volunteers provide their phone number which will be kept by Coordinators and Directors of the Centre, as long as the volunteers are present. Volunteers also sign a Volunteer Agreement, Code of Conduct as well as Safeguarding Policy that will be stored in the Google Drive for a limited time not exceeding five years.

Individuals who use the services provided by Fáilte

Information is obtained from a participant when he/she provides their personal information in a conversation with staff/volunteers. This and other information observed may be used to track protection and mental health concerns. Other identifying information may be gathered through monitoring and evaluation initiatives, in order to keep track of the daily and weekly engagement. Individuals may also provide identifying information (e.g. name, contact details) through consent gathering for photography/videography/sharing creative pieces. These consent forms remain in the Fáilte Google Drive until the individual leaves the service, or if they request for it to be rescinded at any point.

Why is this data collected?

Recruitment

Fáilte collects data listed above for the purposes of recruiting and engaging volunteers and interns for our project.

Human resources

In order to manage volunteers and our services, Fáilte may gather information related to performance, annual leave and or expenses in addition to the personal information listed above under 'volunteers (including long term volunteers/internships).'

Agreements with volunteers, donors, suppliers and business partners

Personal data listed prior may be collected and stored in order to execute agreements, including Volunteer Agreements and Donor Agreements/MoU. Such agreements may also be executed to effect payment for services rendered, or goods purchased.

Donors relations

Fáilte may gather the data listed above in order to track donations (e.g. number of visits to our website, analysis of donations logged through Paypal, Chuffed, or our bank account etc.) and to engage existing donors (e.g. e-mail addresses provided through our website/Chuffed). This is also related to gathering information from institutional donors for MoU, or information from entities providing in-kind donations.

Information sharing

To keep subscribers informed of our activities through our social media, through our MailChimp platform or e-mails.

Monitoring & evaluation and organisational analysis

Website analytics and social media analytics may fall under this category, in addition to information gathered from individuals who use our service for monitoring and evaluation purposes (e.g. age, nationality, languages spoken). The purpose of collecting general information on visits to the website is to optimise the design of the website.

Consent for likeness to be used

Fáilte may gather names, signatures and contact details of individuals saved to our Google Drive to track who has provided consent to be photographed, or for their works to be shared on our social media channels.

Protection concerns

Coordinators may gather information from individuals facing protection concerns (with consent) in order to transmit this information to track protection cases and to submit pertinent information to the relevant protection authorities and services as required by law.

Internal communications

In order to facilitate communication and information sharing amongst staff, volunteers, and other stakeholders, Fáilte may create WhatsApp groups and share internal updates.

Storage and Access to Data

Who has access to your data?

Relevant staff

Only the relevant staff (i.e. Directors of the Centre, Coordinators) will have access to your data.

Third-party applications

Third-party applications such as PayPal and Stripe may access your data with your consent.

Where is the information stored/collected and their privacy statements?

Chuffed.org (privacy statement <u>here</u>) PayPal (privacy statement <u>here</u>) WhatsApp (privacy statement <u>here</u>) Google Drive (privacy statement <u>here</u>) Stripe (privacy statement <u>here</u>) SquareSpace (privacy statement <u>here</u>) Mailchimp (privacy statement <u>here</u>)

For how long does Fáilte retain your data?

Fáilte retains your data for as long as your contract lasts or for as long as it takes to carry out our actions, unless it is deemed necessary to prolong this period based on Fáilte's legitimate interests and legal bases (outlined below).

Legal Basis and Rights

What is the legal basis for collecting this data?

- Contractual relationship
- Consent, where required
- Legal obligations of The Fáilte Centre
- Legitimate interest of The Fáilte Centre

The Fáilte Centre will not process or collect data for any purpose outside of what is listed above, and will only do so after obtaining your explicit consent to do so.

What are your rights?

Right to information / transparency

You have the right to know who is processing your data, what it is and why.

Right to access

You have the right to request free access to your data.

Right to correction

You have the right to request the correction of inaccurate personal data and the completion of your incomplete data.

Right to be forgotten

You have the right to request the deletion of data, under certain conditions (e.g. the data is no longer necessary).

Right to restrict processing

You have the right to ask us to limit the processing of your data while we review objections to data processing.

Right to data portability

You have the right to request the transfer of your data to another controller.

Right to oppose

You have the right to object to the processing of your data, and Fáilte will comply with this request unless legitimate and legal interest prevails.

Right to withdraw consent

You may withdraw your consent at any time.

If you no longer want your personal data processed

We will comply with your request unless we have reasons for lawfully retaining data about you.

If we are holding personal data about you and using that data for marketing purposes or for any other activities based on your consent, you may notify us at any time that you no longer want us to process personal data about you for particular purposes or for any purposes whatsoever and we will stop processing your personal data for that purpose. This will not affect your ability to receive our services.

Use of analytics tools, cookies and other technologies

We continuously work with the user experience on our website and collect different types of information from our users so that we can provide the best possible functionality. Examples of such information are which pages are visited, and what kind of browser is used.

We also use technology to analyse data. The technology is used partly because it is necessary for services to function, partly because it will be easier to use the service

and partly to enable us to carry out analyses that enable us to further develop our service.

By using our service, users agree that we may use such tools unless they disable them, for example, by disabling a third-party tool by clicking on an opt-out link on our website.

What are cookies?

A cookie is a small text file stored on the user's PC/mobile phone/tablet, which helps us make the visits to our sites more meaningful and positive to the user. For example, cookies may contain user settings and information about how they have surfed and used our website, etc. The web application that allows you to register a personal profile uses cookies to save user preferences in the browser. Use of cookies is required to use this service.

How do we use cookies?

We use cookies to facilitate the use of our service and to provide our users with relevant information when they visit our site. Cookies are also used to measure traffic on our website, to gather statistics and to improve our service.

Security

The Fáilte Centre shall ensure that personal data is stored securely using modern software that is kept up-to-date. Access to personal data shall be limited to personnel who need access and appropriate security will be in place to avoid unauthorised sharing of information. When personal data is deleted, this will be done safely so that the data is irrecoverable. Additionally, appropriate back-up and disaster recovery solutions will be in place.

Defined terms in this Privacy Statement

- **Controller** is a legal term set out in the General Data Protection Regulation (GDPR) that means the party responsible for deciding what personal data to collect and how to use it.
- **Data subject** means the individual who can be identified from the personal data.

- **Personal data** means data which can be used to identify a living individual. This could be a name and address or it could be a number of details which when taken together make it possible to work out who the information is about. It also includes information about the identifiable individual.
- **Special categories of personal data** means details about an individual's race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about health and genetic and biometric data.