



# CRC PRIVACY NOTICE

Your privacy is important to us. In the Central Remedial Clinic (CRC), we respect your right to privacy, and we comply with our obligations under the relevant data protection legislation. The aim of this Privacy Notice is to explain how the CRC collects and uses personal data for the provision of our services and to outline individual's rights as data subjects.

Everyone working within health and social care has a legal duty to keep information confidential. All medical information under Irish Data Protection Act 2018 and GDPR (EU) 2016/679 is deemed a special category of personal data and as such we will endeavour to ensure your information is treated with the utmost respect and confidentiality.

We use your information to manage and deliver the services you require and to keep records about your health and any treatment or support you may receive from us. It is important for us to have a complete picture as this information enables us to provide the right care to meet your individual needs.

## WHO ARE WE?

We are the Central Remedial Clinic ("the CRC") a company limited by guarantee under company number 14880. We are a registered charity under number 4998 and a Section 38 Agency under the Health Act 2004. We operate a number of centres in Ireland in areas around Dublin, Waterford, Limerick as well as outreach clinics throughout the country. We are a representative organisation and service provider for people with disabilities.

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

## WHAT PERSONAL INFORMATION DO WE COLLECT?

For the purpose of the Data Protection Act 2018 (the DPA) and General Data Protection Regulation (EU) 2016/679 (the GDPR): Central Remedial Clinic is a Data Controller as an employer, as a service provider, as a fundraiser and where dealing with suppliers.

We collect the following types of personal data from you:

### **Personal Data**

- Name, address, telephone, email, date of birth, next of kin information if applicable or photo ID when corresponding with us by phone, e-mail, filling in forms on [www.crc.ie](http://www.crc.ie) (our website), submitting a request or providing feedback/comment in relation to our services or otherwise. We ask you to disclose only as much information as is necessary to provide you with services;
- Name, contact details and financial information when donating to our organisation by phone, email or via our online donations page;
- Name and contact details for correspondence in relation to fundraising activities and events;
- CCTV and security information using our facilities. CCTV is in operation to ensure the security of our assets, service users, staff and volunteers;
- Applying to work with us. The type of information you may provide in your CV, a cover letter, your name and contact details. CVs should include information relevant to your employment history and education (degrees obtained, places worked, positions held, relevant awards, and so forth). We ask that you do not disclose sensitive personal data (e.g. gender, height, weight, medical information, religion, philosophical or political beliefs) in your application.

### **Special Category Personal Data (Sensitive data)**

- Details and records of treatment and care, notes and reports about your health, including any allergies or health conditions. We collect this information directly from you through appointments, from your relatives or next of kin or from a referral made by your GP, the HSE or another Health Care Practitioner (HCP);
- We may also collect other information about you, such as your sexuality, race or ethnic origin, religious or other beliefs, financial information, and whether you have a disability or require any additional support with appointments (like an interpreter or advocate);
- Data such as pre-employment checks and health and character information may be sought from previous employers, clinicians.

### **WHY DO WE COLLECT THIS INFORMATION?**

We collect the information in order to provide you with our services, to market our services including training courses and conferences, to communicate with you about fundraising, to improve our website and to recruit staff. We will use this information:

#### **Service Users**

- To set you up as a Service User on our systems;
- To provide you with our services and communicate with you about appointments;
- To conduct quality assurance processes and to identify service user's experience and satisfaction with our services to allow us to improve and develop those services;
- For risk and claims management processes;
- To carry out internal clinical audits;
- For staff education and training.

#### **Research Participants**

- For retrospective chart review studies that are low risk, if approved by our Research Ethics Committee. Any data or findings published or shared with others will not reveal your identity;
- To determine eligibility to take part in a health research study.

Research has a vital role to play in the development of healthcare and health service delivery. We support and promote research activity within the CRC. Explicit consent must be obtained from participants and our Research Ethics Committee must approve research before it takes place.

#### **Candidates**

- To communicate with you;
- To create a candidate profile for you if you are a prospective employee or volunteer;
- To process employment applications, including by assessing qualifications, verifying information, conducting reference or other pre-employment checks;
- To process data to take steps at your request prior to entering a contract with you. We may also need to process your data to enter a contract with you;
- In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, it is mandatory to check a successful candidate's eligibility to work in Ireland before employment starts;
- To manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job.

#### **Donors**

- To process your donation;
- To comply with statutory obligations;
- To deliver information to you about our services and events, where you have subscribed to receive same, your preferences can be updated at any stage.

#### **Website Users**

- To administer and improve our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- As part of our efforts to keep our website safe and secure;
- To make suggestions and recommendations to you and other users of our website about services that may interest you or them.

## WHAT IS THE LAWFUL BASIS FOR PROCESSING YOUR DATA?

Lawful basis under General Data Protection Regulation (EU 2016/679) and Data Protection Act 2018

<b>Provision of Health and Social Care</b>	<ul style="list-style-type: none"><li>• processing is necessary for the performance of a task carried out in the public interest, in the area of public health</li><li>• processing is necessary for the purpose of preventative...medicine...the provision of health or social care or treatment or the management of health or social care systems and services...</li><li>• for the purposes of preventative or occupational medicine, for medical diagnosis, for the provision of medical care, treatment or social care, or pursuant to a contract with a health practitioner</li><li>• processing necessary for performance of contract with you</li><li>• compliance with a legal obligation and/or processing is necessary for the establishment, exercise or defence of legal claims</li></ul>
<b>To improve services and plan future care</b>	<ul style="list-style-type: none"><li>• processing is necessary for reasons of public interest in the area of public health, such as...ensuring high standards of quality and safety of health care...</li><li>• processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes</li><li>• for the management of health or social care systems and services</li></ul>
<b>To understand and develop new treatments and techniques (Research)</b>	<ul style="list-style-type: none"><li>• you have given explicit consent to processing for one or more specified purposes</li></ul> <p>In some circumstances, consent exemptions may be granted under Health Research Regulations 2018</p>
<b>Fundraising and Marketing</b>	<ul style="list-style-type: none"><li>• you have given consent to processing for one or more specific purposes</li></ul> <p>Where we rely on consent as the legal basis for processing, you can withdraw your consent at any time</p>

## WHERE DO WE STORE THIS INFORMATION?

Your data may be stored within electronic or paper records, or a combination of both. All our records have restricted access controls, so that only those individuals who have a need to know the information can get access. Your personal data is processed in our centres in Dublin, Waterford and Limerick. Hosting and storage of your data takes place in CRC Clontarf located in Dublin, Ireland.

## WHO DO WE SHARE THIS INFORMATION WITH?

Within the CRC, the health-related data collected by a healthcare professional or staff member authorised to process your data is not passed on to others, unless it is considered necessary for your health or social care needs.

We may share your personal data and where necessary, special categories of personal data, with selected third parties as listed below\* including suppliers and contractors in order to provide you with our services. For example, these suppliers may include our web hosting provider and our IT service providers. When using the services of any third party the CRC will ensure that the third party will provide suitable technical and organisational measures to protect the personal data as required by the applicable law.

In addition we may disclose your personal information (including special categories of personal data) to third parties: where we are under a duty to disclose or share your information in order to comply with any legal obligation; or in order to enforce or apply our terms of use and other agreements; or to protect our rights, property, safety of our service users or others; or where solicitors or your elected power of attorney have your written authorisation to be provided with the personal data we hold about you. This includes exchanging information with other organisations for the purposes of fraud protection and credit risk reduction.

Third Party Name	Description of Services Provided
Health Service Executive (HSE)	<ul style="list-style-type: none"> <li>• Provision of health and social care services to CRC service users and CRC Children’s Disability Network Team (CDNT) service users.</li> <li>• Legal obligation to report on specific areas such as safeguarding, finance requirements, aids.</li> <li>• Public health services requirements under the Health Act 2004.</li> </ul>
Department of Health (DOH)	<ul style="list-style-type: none"> <li>• Provision of health and social care services to CRC service users and CRC Children’s Disability Network Team (CDNT) service users.</li> <li>• Public health services requirements under the Health Act 2004.</li> </ul>
Health Research Board (HRB)	Legal obligation to keep the National Ability Supports System (NASS) database up to date.
External CHO Health Care Agencies	To support the continuing provision of health and social care services.
External Health Care Professionals (HCP)	To support the provision of health and social care services to CRC service users.
CRC School Clontarf	To support the provision of health and social care services to CRC service users.
Scoil Mochua Clondalkin	To support the provision of health and social care services to CRC service users.
TUSLA Child & Family Agency	Legal obligation to disclose certain information.
Child and Adolescent Mental Health Services (CAMHS)	To support the provision of health and social care services to CRC service users.
Department of Social Protection	Legal obligation to disclose certain information.
Department of Transport	For operational purposes access to services i.e. transport.
Department of Further and Higher Education	To support the provision of educational services to CRC service users.
City of Dublin Education and Training Board (CDETb)	To support the provision of educational services to CRC service users.
Quality & Qualifications Ireland (QQI)	To support the provision of educational services to CRC service users.
AIM Supports (Access and Inclusion Model) and ECCE Scheme (Early Childhood Care and Education)	Facilitate access to national supports for children.
Health and Safety Authority (HSA) and State Claims Agency (SCA)	Legal obligation to report workplace injuries.
Revenue Commissioners	Legal obligation to disclose certain information.
Other Statutory bodies relevant to the provision of supports	To support the provision of health and social care services to CRC service users.
Nutritional Analysis Provider (Dietetics)	To support the provision of health care services to CRC service users.
Health Informatics Centre (HIC)	Access to the Cerebral Palsy Integrated Pathway (CPIP) system for clinical and research purposes.
Rezoomo	HR recruitment and selection purposes.
Corporate Health Ireland	Pre-employment medicals/occupational health assessments.
Medmark	Health check services.
Mason Hayes and Curran	Legal advisors.

Netwatch	Provision of CCTV equipment and services.
Kefron	Archiving and document storage services.
DGD Shredding	Secure document destruction and shredding services.
Microsoft	Email and IT systems provider.
Future Range	Cloud backup storage.
Attend Anywhere	Host virtual clinical appointments.
Txt Connexions	Text reminders for clinical appointments.
Eventbrite	Appointment booking for clinical appointments.
Zoom	Host virtual meetings.
Zendesk	IT helpdesk support services.
IT/Software Providers	<ul style="list-style-type: none"> <li>• Firewall provider</li> <li>• Internet broadband provider</li> <li>• Telecommunications provider</li> <li>• HR Software for managing employment records</li> <li>• Financial software for processing payroll and pension payments</li> </ul>
Digital Revolutionaries	CRC website provider.
Stripe	Process online donation payments.
MetaCompliance	Staff training.
ATF Solutions	Staff training.
Usafety	Staff training.
Interling Translators	Interpreters for CRC service users.
*This list is not exhaustive. CRC reserves the right to update as the need arises.	

## HOW LONG DO WE KEEP HOLD OF YOUR INFORMATION?

We will retain your information for as long as necessary to provide you with services, and to comply with our legal and regulatory obligations as per CRC personal data retention schedule. After this period, your personal data will be irreversibly destroyed.

## WHAT ARE YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA?

Should you believe that any personal data we hold on you is incorrect or incomplete, you can request to see this information, rectify it or have it deleted.

You have the following rights:

- The right to access the personal data we hold about you;
- The right to require us to rectify any inaccurate personal data about you without undue delay;
- The right to have us erase any personal data we hold about you in circumstances such as where it is no longer necessary for us to hold the personal data or, in some circumstances, if you have withdrawn your consent to the processing;
- The right to object to us processing personal data about you such as processing for profiling or direct marketing;
- The right to ask us to provide your personal data to you in a portable format or, where technically feasible, for us to port that personal data to another provider provided it does not result in a disclosure of personal data relating to other people;
- The right to request a restriction of the processing of your personal data;
- Where our processing of your personal data is based on your consent to that processing, you have the right to withdraw that consent at any time but any processing that we have carried out before you withdrew your consent remains lawful.

## CONTACT INFORMATION

To make a request to access records the CRC may hold on you, please email [SARS@CRC.IE](mailto:SARS@CRC.IE).

In the event you wish to enquire about your rights or complain about how we have handled your personal data, please contact CRC's Data Protection Officer (DPO) [DPO@CRC.IE](mailto:DPO@CRC.IE) who will investigate your complaint and work with you to resolve the matter.

Data Protection Officer  
Central Remedial Clinic  
Penny Ansley Building  
Vernon Avenue  
Clontarf  
Dublin 3  
D03 R973

You also have the right to lodge a complaint with the Data Protection Commission (DPC) via their website at [WWW.DATAPROTECTION.IE](http://WWW.DATAPROTECTION.IE).