

# LADRA Privacy Statement covering Membership and Use of our Website

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**In this Privacy Statement references in these “We”, “Us” or “Our” means LADRA references to “You” or “Your” shall mean you.**

## **1. What is a Privacy Statement?**

A Privacy notice (or Privacy Statement) is a way of communicating what information We hold, what Our legal reason for collecting the information is and what We use the information for. It also lets You know what Your rights are.

This Privacy Statement relates to data processed by LADRA. This Privacy Statement sets out how LADRA uses and protects any information that You give Us as both a member of Our association and when You use LADRA’s website.

## **2. Who Are We?**

We’re Lansdowne and District Residents’ Association (“LADRA”) a voluntary residents’ association managed by dedicated volunteers.

## **3. What is the General Data Protection Regulation?**

The new General Data Protection Regulations (the “**GDPR Regulations**”) is a European Union (EU) wide set of standardised rules for the handling and storage of personal information within the EU. The GDPR Regulations will come into force on **25th May 2018**, bringing substantial changes to Data Protection Laws<sup>1</sup> designed to strengthen and unify data protection within the European Union.

The GDPR Regulations apply to any organisation which controls or processes Personal Data<sup>2</sup> of an EU citizen.

We are classed under the GDPR Regulations as a Data Controller meaning that we decide how the Personal Data We receive is processed and for what purposes. For all data related matters or queries please contact our data protection officer at [DataManager@LADRA.org](mailto:DataManager@LADRA.org)

## **4. What information do we collect?**

We collect the following information from You when You apply to be a member of our Organisation: -

- First Name;
- Surname ;
- Residential address ;
- Email Address;
- Phone number;

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<sup>1</sup> Data Protection Acts 1988 and 2003 (RoI)

<sup>2</sup> Personal data can be defined as any information relating to a natural person, the data subject, who can be directly or indirectly identified by the use of that data. The GDPR Regulations refines the definitions of personal data and sensitive data. Personal Data now extends to online identifiers such as an email address, IP address, cookies.

- Subscription i.e. amount paid or if outstanding ;
- Date of payment ;
- Receipt reference.

From time to time, We may (store/ control) and process additional personal information for example Your image / photograph of LADRA events which You have attended as a member of LADRA. Photographs will be uploaded onto our secure website password protected LADRA member's area.

The information which We collect and store is that which You volunteer when You email us, fill in a membership Application Form or browse our website. The information therefore which We collect and process about you may include but not be limited to Your email address, phone number, address, some personal details and the information which you have provided by filling out any LADRA questionnaire/forms.

LADRA will never ask for your Credit Card details and request that You do not enter these details on any of LADRA's application forms.

LADRA may from time to time pass on Your information to a third party with Your consent such as a Summer Camp Provider, Class Teacher, etc., for which You have signed up for. This information is shared specifically to identify You and to reply the information which You have provided for that service when You signed up to attend/take a class or function provided by LADRA in conjunction with another local association.

We will never, trade, swap, sell or distribute your Personal Information to a third party without Your consent unless We are allowed to so by law, in an emergency including in connection with an investigation of a possible criminal act.

LADRA's website does not hold personally identifiable information, except where used for administration purposes and the images/ photographs as referred to in Section 4 above.

LADRA is committed to ensuring that Your privacy is protected. Should We ask You to provide certain information by which You can be identified, then You can be assured that it will only be used in accordance with this Privacy Statement.

We will not transfer or store your personal data outside of EU.

## **5. How do we collect information from you?**

We obtain information about You when You use our website when You use, register to join LADRA, contact us about services, community issues and/or if You receive one of Our regular LADRA newsletters and avail of Our services.

We also receive and process personal information regarding membership applications and renewals.

## **6. Is your information secure?**

The privacy and data security of our members is important to Us.

We hold Your information either securely within Our online systems or on paper, which is held securely at the premises of designated LADRA Committee members. We have data protection policies and procedures in place to manage this security and We regularly test and check our procedures.

We are at all times committed to protecting the security of Your data and We treat this so that it must be protected against loss and unauthorised access. Access to visitor information is limited only to those within LADRA who are duly authorised to have access to that information.

When You give us Your personal information, We will take steps to ensure that it's treated securely. Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure.

We cannot, however, guarantee the complete security of Our database nor can We guarantee that any information which You supply will not be intercepted whilst being transmitted to Us over the internet. By submitting your personal data You agree to transfer, storing and processing of Your personal information.

While We strive to protect Your personal information, We cannot guarantee the security of any information You transmit to Us, and You do so at Your own risk. Once We receive Your information, We make Our best effort to ensure its security on Our systems. Where We have given (or where You have chosen) a password which enables You to access certain parts of Our websites, You are responsible for keeping this password confidential. We ask you not to share Your password with anyone.

## **7. Who has access to Your information?**

LADRA requires access to Your personal information such as Your name, address, phone and email details as outlined above in order to process your membership of LADRA. It is important to note:

- We will not sell or rent Your information to third parties.
- We will not share Your information with third parties for marketing purposes.

We will only share Your information, with Your agreement, in an emergency or where We are required to do so by law including in connection with an investigation of a possible criminal act.

## **8. How is Your information used?**

The information We collect from you (described above) may be used in one of the following ways:

- To process applications or renewal of membership records of LADRA;
- To process annual membership fees;
- To process applications for courses, conventions or events ;
- The maintaining of electronic mailing lists that You have subscribed to;
- To send periodic emails (e.g. newsletters mostly and occasional *ad hoc* newsletters in relation to local issues in Lansdowne environs);

- To inform You of upcoming events (including via our newsletter);
- To inform You of any cancellations to events (including via our newsletter);
- To respond to inquiries in relation to content or issues in Our newsletters or other communications;
- To deal with entries into any Competitions which We may run;
- To seek Your views or comments on issues;
- To notify You of changes to Our services and/ or improve Our services;
- To send You other communications which You have requested and that may be of interest to You including information about campaigns, appeals, activities, promotion of LADRA as well as to inform You of the venues of any meetings; and other details as well as the results.

We will only send You emails of a non-commercial nature, although it is possible We may publicise commercial events or activities (without fee) if We believe these may be of interest to our members.

## **9. What is Our legal basis for processing Your personal data?**

Our lawful basis for processing Your general personal data under article 6 of GDPR is as follows: -

Consent of the data subject –

We will directly ask for Your consent to process data;

- When You sign up for Our regular newsletter on our website;
- When You register for membership of LADRA on our website or through paper forms;

Processing may also be necessary for the performance of a contract with the data subject or to take steps to enter into a contract –

We will collect and use Your personal data in the following circumstances:-

- We will use Your personal data to process and facilitate Your membership of LADRA;
- When You make a purchase membership on Our website using [PayPal](https://www.paypal.com/ie/home)<sup>3</sup> so that we can process your payment, confirm transaction details (typically via email) and arrange receipt of annual membership;
- When You wish to reserve places for LADRA events so that We can process your application ;
- Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject.

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<sup>3</sup> <https://www.paypal.com/ie/home>

## **Consent to Receive Certain Emails**

We send email communications about Our activities to members and visitors to Our website who sign up and give prior consent. Any emails that are sent, are sent for the such purposes or information.

### **10. How long does LADRA retain Your personal information ?**

- We review Our retention periods for personal information on a regular basis;
- We are legally required to hold some types of information to fulfil our statutory obligations.

If You require further information about this please let us know.

### **11. Your choices**

You have a choice about whether or not You wish to receive information from Us. If you do not want to receive direct communications from Us, then please let Us know.

Opting out can be accomplished by sending an email request stating “remove me from LADRA email communications” to LADRA

We will not contact You for marketing purposes by email, phone or text message unless You have given your prior consent.

### **12. What happens when You no longer wish to receive newsletters?**

The email address You provide may be used to send You information, respond to inquiries, and/or other requests or questions relating to LADRA Residents’ Association and associated issues around Dublin 4.

Under the GDPR, You have the right to erasure which is also known as the ‘right to be forgotten’. This enables You to request the deletion or removal of Your personal data where there is no compelling reason for its continued processing by Us.

### **13. How You can access and update Your information**

The accuracy of Your information is important to Us. We’re working on ways to make it easier for You to review and correct the information that We hold about You.

In the meantime, if You change email address, or any of the other information We hold is inaccurate or out of date, please email Us at: [DataManager@LADRA.org](mailto:DataManager@LADRA.org). Alternatively, You can contact your representative (ref. [LADRA website page](#)).

### **14. Subject Access Requests**

You have the right to ask for a copy of the information LADRA holds about You

Should You send us a Subject Access Request. We are obliged to provide You with whatever personally identifiable information We hold.

In Your case, this will only be the email address, Your first name and Your surname and any details mentioned in clause 4 above. For the purposes of the General Data Protection Regulations (GDPR), We have 1 month's notice to provide this information to You.

## **15. Data Breaches**

The GDPR places a duty on all organisations to report specific types of data breach to the Data Protection Commissioner, and in some cases, to individuals.

We will only have to notify the Data Protection Commissioner of a breach where it is likely to result in a risk to the rights and freedoms of individuals.

## **16. How to make a complaint?**

To exercise all relevant rights, queries or complaints please in the first instance contact LADRA's Data Management committee member via email at [DataManager@LADRA.org](mailto:DataManager@LADRA.org) or contact your representative (ref. [LADRA website page](#)).

If this does not resolve Your complaint to Your satisfaction, You have the right to lodge a complaint with the Data Protection Commissioner's Office (Ref. <https://www.dataprotection.ie/docs/Home/4.htm> ).

## **17. Further processing**

If We wish to use Your personal data for a new purpose, not covered by this Data Privacy Notice, then We will provide You with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

## **18. Aged 16 or Under**

We are concerned to protect the privacy of children aged 16 or under. We do not process anyone's data aged under 16 without their parents/guardian's explicit permission. If You are aged 16 or under please get your parent/guardian's permission beforehand whenever You provide us with personal information.

## **19. Photographs at LADRA events**

LADRA members, residents and friends may take photos at LADRA events eg BBQ, street parties, Christmas parties etc. In order to ensure compliance with Data Protection Acts and privacy laws, the photographer should obtain the prior consent of the persons being photographed and in the case of children or minors (under 18 years) the permission of the child's parent./guardian will need to be obtained.

Such images may be provided to LADRA by residents /members to be used in LADRA newsletters, and /or published on password protected pages/ posts for members only on LADRA's website.

All Photographs provided to Us by Members /Residents for publication on Our member's area must have appropriate consents of the persons being photographed. In addition, the

permission of the copyright holder usually the person who took the photograph is also required.

Photographic images will be stored securely until the next event, after which the photos will be deleted.

If you would prefer not to be photographed, please contact LADRA. If you would like us to delete your image from our secure Members Area please contact us.

## **20. Cookies**

A “cookie” is a small data text file that is placed in your browser and allows LADRA to recognize You each time You visit this site (customization etc). LADRA does not use cookies to collect personal information. Other than for temporary, technical operation of some features, this the LADRA website does not use cookies.

Cookies may also be used by 3<sup>rd</sup> party content providers such as newsfeeds.

If You do not want to accept cookies, You can change Your browser settings so that cookies are not accepted. If You do this, please be aware that You may lose some of the functionality of this website. For further information about cookies and how to disable them the following web pages may be helpful.

<https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>

<https://support.apple.com/en-ie/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

<https://support.microsoft.com/en-us/help/260971/description-of-cookies>

## **21. Links to other websites**

Our website may contain links to other websites run by other organisations as a convenience to You when You visit our website.

If You follow a link to any of those websites please note that that does not imply that LADRA has endorsed the third party external website.

These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites.

You are advised to read the privacy policy of external sites before disclosing any personal information.

Should You click on a link, then You are discharging LADRA from any liability through your use of the third party site. Nevertheless, We seek to protect the integrity of Our site and welcome any feedback about these sites.

## **22. Remember The Risks Whenever You Use The Internet**

While We do Our best to protect Your personal information, We cannot guarantee the security of any information that You transmit to LADRA and You are solely responsible for maintaining the secrecy of any passwords or other account information. In addition other Internet sites or services that may be accessible through LADRA has separate data and privacy practices independent of Us, and therefore We disclaim any responsibility or liability for their policies or actions.

Please contact those vendors and others directly if You have any questions about their privacy policies.

## **23. Contacting US**

If You have any questions about this Privacy Statement, the practice of Our website or Your experience on Our website You can contact us at: Email: [DataManager@LADRA.org](mailto:DataManager@LADRA.org)

All requests received will be dealt with promptly and efficiently by Us.

## **24. Review of this Privacy Statement**

With the introduction of the **General Data Protection Regulations (GDPR)** on **25th May 2018**, this privacy policy has been updated to reflect the changes in the data protection laws.

Any changes We may make to Our privacy statement in the future will be posted on this page and, where appropriate, notified to You by e-mail.

Your continued use of the website signifies Your assent to LADRA. We accordingly reserve the right at Our discretion, to modify, add or remove such portions of this Privacy Statement at any time by posting the revised policy on Our website. We would advise therefore that You should continue to check this specific page periodically for such changes

This website as a whole is intended primarily as a resource for LADRA members. It is published and promoted by and on behalf of LADRA, the names of whose officers/committee members appear on the [LADRA web page](#)<sup>4</sup>, and is hosted by: [Blacknight](#)<sup>5</sup>.

This Privacy Statement was last updated on 23<sup>rd</sup> May 2018.

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<sup>4</sup> [http://ladra.org/?page\\_id=5](http://ladra.org/?page_id=5)

<sup>5</sup> <https://www.blacknight.com>