Data Protection Notice for Users of the Citizens Information Service

Who are we?
There are currently 8 regional Citizens Information Service companies.

We provide information, advice and advocacy services.

We are funded by the Citizens Information Board, a state agency, located at Georges Quay House, 43 Townsend Street, Dublin 2.

This notice sets out the basis on which any personal data we collect from you or from others will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

Please refer to the table below for details of each CIS company, including which areas they cover.

For the purpose of the Data Protection Acts 1988-2018 and the General Data Protection Regulation (GDPR) (EU 2016/679), each of the companies listed below is a data controller for any data obtained by someone who used their services. The data protection contact within each company is their Regional Manager.

**North Dublin Citizens Information Service CLG**
*Registered address:* Balbriggan Public Library, Saint George’s Square, Balbriggan, Co. Dublin, K32TW27
*Areas covered:* Dublin Fingal and the Dublin City Council Area north of the River Liffey.
*Offices currently located in:* Balbriggan, Swords, Malahide, Blanchardstown, Green Street, James Joyce Street, Finglas, Cabra, Ballymun and Coolock.
*Contact us:* 0818 07 7450 or Data.ND@citinfo.ie

**Dublin South Citizens Information Service CLG**
*Registered address:* Citizens Information Centre, Hainault House, Belgard Square South, Dublin 24, D24RFV0
*Areas covered:* Ballyfermot, Carmelite CIC, Clondalkin, Dublin 12 & 6w CIC, Dun Laoghaire, Dundrum, Liberties CIC, Lucan, Rathmines, Tallaght
*Contact us:* 0818 07 8340 or Data.DS@citinfo.ie

**North Leinster Citizens Information Service CLG**
*Registered address:* Floor 2, 1 Cannon Row, Navan, Co. Meath, C15 XR8Y
*Areas covered:* Kildare, Longford, Louth, Meath, Westmeath
*Contact us:* 0818 07 6150 or Data.NL@citinfo.ie
What personal data do we collect from you?

We may collect a range of personal data from you, depending on your circumstances and the services you require. You may give us personal data by:

- Corresponding with us by phone, email or otherwise. We ask you to disclose only as much information as is necessary to provide you with our services or to submit a question, suggestion or comment in relation to our services.

- Attending meetings with us. These meetings might include the provision of personal data by you, or the filling in of forms required for us to provide a service to you.

- Visiting our website or social media channels, where applicable. If you wish to contact us using social media, please consult the privacy policy of the social media service provider for details on their privacy practices.

- Attending at an office where CCTV (Closed Circuit Television) is in operation.
In some cases, we may receive data from you that relates to another individual, for example, in a joint bank statement. In these cases, we will use the information purely for the purposes of the provision of services to you and we will not otherwise process the data.

**What personal data do we obtain from others?**

When you use our services, we may obtain, with your authorisation, personal data from others, such as:

- Records relating to your situation, for example, your file from the Department of Social Protection or correspondence from your employer.

The records that we may obtain will vary depending on your circumstances and the third parties involved. In obtaining this information we may use a variety of processes such as data subject access requests and Freedom of Information requests. We may use a copy of your authorisation (consent) to access this information.

**Why do we collect this personal data?**

We collect your personal data in order to provide you with our services. We may use your personal data:

- To contact you to arrange appointments
- To provide information and advise you generally
- To assess your circumstances and to recommend courses of action
- To provide an advocacy service by engaging with third parties in relation to your situation, including public and private organisations
- To assist you to fill in forms relating to public and social services
- To assist you in any steps involved in accessing public or social services
- To keep you informed in relation to your advocacy case
- To conduct statistical analysis and reporting, for training purposes, for quality review purposes and for social policy purposes

The legal basis for the processing of your data are:

- That you have provided consent for the processing for the provision of our services
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us as the controller
- Processing is necessary for compliance with a legal obligation to which we are subject

From time to time, we may also collect special category data (see glossary) in the provision of our services. The legal basis for the processing of your special category data is:

- That you have provided consent for the processing for the provision of our services
Who do we share this personal data with?

We may share your personal data with other Citizens Information entities, with the Citizens Information Board and with public and private organisations in order to provide you with our services.

We attach at Schedule 1 a list of entities and categories of entities with which your personal data may be shared.

In addition, we may disclose your personal data to third parties:

- If there is a risk of serious harm to you or to another person or to property
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation
- If we are required to give evidence in court
- To get legal advice or to defend a legal right
- In the event of a disclosure relating to a risk of harm to a child

How long do we keep hold of your personal data?

The time periods for which we retain your personal data depends on the type of information and the purposes for which we use it. We will keep your personal data for no longer than is required or permitted. In most cases we do not need your personal details in order to provide you with information and advice; however, if we do, we expect that your data will be deleted within six months of obtaining it.

Where we have completed any advocacy work for you, we will retain your personal data for three years, after your case has been closed.

Do we transfer your personal data outside the European Union or European Economic Area?

In limited cases, certain cloud processors may transfer your data outside the EEA. In each case, this is covered by a Standard Contractual Clause. The role of standard contractual clauses, as defined by the GDPR, is to ensure appropriate data protection safeguards are in place for international data transfers outside the EEA. The standard contractual clause will afford a level of protection essentially equivalent to that guaranteed within the EEA.

What are your rights with respect to your personal data?

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:
  o where it is no longer necessary in relation to the purpose for which it was originally collected/processed
  o if you have withdrawn your consent to the processing
  o where you object to the processing and there is no overriding legitimate interest to continue the processing
  o the personal data has to be erased in order to comply with a legal obligation or the personal data was unlawfully processed
• In circumstances where we rely on processing being necessary for the performance of a task carried out in the public interest, you have the right to object to us processing personal data about you
• The right to ask us to provide your personal data to you in a portable format or, where technically feasible, for us to transfer 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:
  o the accuracy of the personal data is contested by you, the restriction must be in place for a period enabling us to verify the accuracy of the personal data
  o the processing is unlawful and you oppose the erasure of the personal data and request the restriction of the use instead
  o we no longer need the personal data for the purposes of processing, but are required by you for the establishment, exercise or defence of legal claims
  o you have objected to processing related to tasks carried out in the public interest, the restriction must be in place pending the verification whether our legitimate grounds override your rights

You may exercise any of the above rights or withdraw your consent by contacting the CIS company who holds your data:

<table>
<thead>
<tr>
<th>Citizens Information Service company</th>
<th>Email Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dublin South CIS</td>
<td><a href="mailto:Data.DS@citinfo.ie">Data.DS@citinfo.ie</a></td>
</tr>
<tr>
<td>North Dublin CIS</td>
<td><a href="mailto:Data.ND@citinfo.ie">Data.ND@citinfo.ie</a></td>
</tr>
<tr>
<td>North Leinster CIS</td>
<td><a href="mailto:Data.NL@citinfo.ie">Data.NL@citinfo.ie</a></td>
</tr>
<tr>
<td>South Leinster CIS</td>
<td><a href="mailto:Data.SL@citinfo.ie">Data.SL@citinfo.ie</a></td>
</tr>
<tr>
<td>North Munster CIS</td>
<td><a href="mailto:Data.NM@citinfo.ie">Data.NM@citinfo.ie</a></td>
</tr>
<tr>
<td>South Munster CIS</td>
<td><a href="mailto:Data.SM@citinfo.ie">Data.SM@citinfo.ie</a></td>
</tr>
<tr>
<td>North Connacht and Ulster CIS</td>
<td><a href="mailto:Data.NCU@citinfo.ie">Data.NCU@citinfo.ie</a></td>
</tr>
<tr>
<td>South Connacht CIS</td>
<td><a href="mailto:Data.SC@citinfo.ie">Data.SC@citinfo.ie</a></td>
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</tbody>
</table>
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.

You may lodge a complaint with your supervisory authority with respect to our processing of your personal data. The supervisory authority in Ireland is the Data Protection Commission. The website is dataprotection.ie.

What will happen if we change our Data Protection Notice?

This notice may change from time to time, and any changes will be posted on the citizensinformationboard.ie website and will be effective when posted. This notice was last updated on 15th December 2023.

How can you contact us?

Please refer to the table above under ‘Who are we’ to get the contact details for the relevant CIS company.
Schedule 1

We have set out below a list of third parties with whom we may share your data.

<table>
<thead>
<tr>
<th>Third party</th>
<th>Description</th>
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<tbody>
<tr>
<td>Any legal successors to the Citizens Information company</td>
<td>Where the Citizens Information company transfers its business to another company or merges with another company</td>
</tr>
<tr>
<td>Other Citizens Information entities</td>
<td>Where we refer your case to another Citizens Information entity in order to provide services, or where advocacy support or case review from another Citizens Information entity is provided</td>
</tr>
<tr>
<td>Citizens Information Board</td>
<td>• In the provision of ICT hardware and software, networks and network storage, case management systems, email, telephony and helpdesk services</td>
</tr>
<tr>
<td></td>
<td>• In conducting statistical and case analysis for the purposes of reporting, training and social policy</td>
</tr>
<tr>
<td></td>
<td>• In the investigation of a complaint in accordance with our complaints procedures</td>
</tr>
<tr>
<td></td>
<td>• In order to provide quality or case reviews</td>
</tr>
<tr>
<td>ICT providers</td>
<td>Where ICT services such as hosting, software, storage or similar are provided or maintained by a third party</td>
</tr>
<tr>
<td>Archiving companies</td>
<td>Where we archive our files in facilities provided by a third party</td>
</tr>
<tr>
<td>Shredding companies</td>
<td>Where our files are securely destroyed by a third party</td>
</tr>
</tbody>
</table>

Depending on your service requirements, and with your authorisation, we may also share your data with other third parties.

<table>
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<th>Third party</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Private organisations</td>
<td>Where we engage with a private organisation on your behalf, for example, with your employer or a service provider</td>
</tr>
<tr>
<td>Public bodies</td>
<td>Where we refer you to a public body or assist you in accessing the services of a public body, for example, the Workplace Relations Commission</td>
</tr>
<tr>
<td>Voluntary organisations</td>
<td>Where we refer you to a voluntary organisation or assist you in accessing the services of a voluntary organisation, for example, the Free Legal Advice Centres (FLAC)</td>
</tr>
</tbody>
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