

1st September 2021

The Care Trust DAC Data Privacy Policy

The Care Trust DAC (The Care Trust, TCT, We, Us, Our) is committed to protecting and respecting your privacy. This policy explains when and why we collect personal information about our Contributors, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We keep this Policy under regular review. This Policy was last updated in September 2021. We may change this policy from time to time so please check this page occasionally to ensure you're aware of the changes. By using our website, you're agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to thecaretrust@give.ie or by writing to The Care Trust, College House, 71 – 73 Rock Road, Blackrock, Co Dublin, A94 F9X9. Alternatively, you can telephone LoCall 1890 253408.

Who are we?

The Care Trust DAC was incorporated in 1974 (Reg. 45561) and registered as a designated activity company in 2016. It is a registered charity (CHY 13691). TCT has been raising funds from the general public for nearly 50 years on behalf of its Beneficiaries (CRC, Rehab Group, and special charitable projects)—all of which provide vital services and support for children and adults with disabilities, those who are disadvantaged and/or those requiring medical care.

The mission of The Care Trust is to *secure sustained charitable giving, in an open and transparent manner, to empower children and adults to live life to the full.*

How do we collect personal information from you?

We obtain your information when you become a Contributor by direct debit, credit card / debit card contribution, cash collection, salary deduction, when you enter our prize draws, contact us about fundraising, or contribute via our websites and web applications.

What type of information is collected from you?

- Personal information we collect might include name, address, email address, and phone number.
- If you signed up to a monthly direct debit to participate in our prize draws, we collect your full bank account details to process your contributions.
- If you used our website to make a credit or debit card contribution, we may collect your computer's IP address.
- If you make a contribution online or via a credit / debit card, your card information is not held by us; it is collected by our third-party payment processors (Global Payments or Stripe), who specialise in the secure online capture and processing of credit/debit card transactions, as explained below.

How is your information used?

We may use your information to:

- process a recurring direct debit mandate that you have signed up to;
- process your contribution (on-line contribution, credit / debit card, cash contribution);
- contact you in relation to your mandate and prize draw entry;
- deal with entries into the prize draw and notify you, if you're a prize winner;
- seek your views or comments on the services we provide;
- notify you of changes to our services;
- send communications, with your explicit consent, that may be of interest to you; (these may include draw results, information about fundraising activities or other possible methods of contributing to our fundraising effort.)
- process a job application.

We review retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil statutory obligations (e.g., the collection of charity tax relief). We hold personal information on our systems only for as long as is necessary for the relevant activity, or as long as is set out in any contract you hold with us. We have a full Data Retention Policy, with a regular process of anonymising and destroying data.

Who has access to your information?

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

We may pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (e.g., to print monthly Draw Result Sheets). However, when we use third party service providers, we disclose only information that is necessary to deliver the service and we have a contract in place that requires them to keep information secure.

Please be reassured that we will not release your information to third parties to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, for the purposes of prevention of fraud or other crime.

When you are using our secure websites / web application pages, your contribution is processed by a third-party payment processor who specialises in the secure capture and processing of on-line payment transactions. If you have questions on this, please contact us.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data to comply with any legal obligation or to enforce or apply our Terms of Service or to protect the rights, property or safety of our Contributors. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

Your choices

You have a choice about whether or not you wish to receive information from us. If you do not want to receive marketing communications from us about our lottery games and the charity work we do, then you can indicate this when we collect your information.

TCT complies with current Direct Marketing legislation. That means, we will not contact you for marketing purposes by email or text message unless you have given consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted. You can change your marketing preferences at any time by contacting us by email, or by telephone, using the contact details provided above.

How you can access and update your information

The accuracy of your information is important to us. If you change email address, or if any of the other information we hold is inaccurate or out of date, please email us at: thecaretrust@give.ie

If you are a Fair Play To You Contributor, please log in to www.fairplaytoyou.ie/myprofile to update your information.

Other Contributors can access, check and update their personal information at any time via TCT's secure ePortal facility: Visit www.thecaretrust.ie and click on to 'My Care Trust Account'. Use your surname and Contributor ID number (provided with your Welcome Letter) to log in.

At any time, you have the right to request us to rectify or erase your data, to restrict processing of your data or to object to our processing of your data. You also have the right to request us to transmit this data to another controller without hindrance, where technically feasible, if certain conditions are met.

You have the right to ask for a copy of the information TCT hold about you and we will provide this to you in full at no cost, unless multiple copies are required in which case there will be a small administration charge. We undertake to respond to any of the above requests without undue delay and at the latest within one month.

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it's treated securely. Any sensitive information (such as payment details) is encrypted and protected with the following software 128 Bit encryption on SSL. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address, etc.) are transmitted normally over the internet, and this can never be guaranteed to be 100% secure. As a result, 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 / website applications, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Links to other websites

Our websites / web applications may contain links to websites run by other organisations. This policy applies only to our websites, so we encourage you to read the privacy statements on other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our site, or if you linked to our website from a third party site.

18 Years of Age or Older

We are concerned to protect the privacy of people under the age of 18. Our Prize Draw rules require all entrants / Contributors to be 18 years or older.

Profiling and Cookies

We don't carry out any profiling of Contributors over and above town-level geo analysis. We have standard Google analytics running on our website which provides demographic analysis that is anonymous and not traceable to individuals.

We do not use cookies on our website. Should we do so in the future, we will provide an alert to the user together with a link to a Cookie Use Policy.

Other TCT Policy Documents

The following documents are available within the Governance section of our website, www.thecaretrust.ie:

- The Care Trust Data Protection Policy including Direct Marketing and Use of Images;
- The Care Trust Contributor Charter and Contributor Care Policy;

- The Care Trust Feedback and Complaints Policy;
- FPTY Contributors' Code of Conduct.