Privacy Statement

We want you to understand and be comfortable with the ways in which we collect and use information relating to identifiable individuals ("**personal data**") when you use our website. In order to understand your rights fully, we encourage you to read this Privacy Statement.

If you do not want the Congregation (defined below) to use your personal data in the ways set out in this Privacy Statement, you can discontinue use of our website or contact us using the contact details below.

We reserve the right to modify this Privacy Statement at any time. If we materially change this Privacy Statement we will take steps to inform you of the change in advance. We will do this through an email, website notices or some other means.

If you ever change your mind about us using your personal data, you can discontinue use of our website, or, if you are a registered member, you can delete your account with us by following the instructions below.

1 Who we are?

We are the Congregation of the Sisters of Mercy (the "**Congregation**"). We provide our website to you from Ireland.

2 To what does this Statement apply?

This statement applies to personal data collected through our website, <u>www.sistersofmercy.ie</u>. It does not apply to other uses of personal data by the Congregation. If you think we are using your personal data in another way (eg as member of the Congregation, an employee or a volunteer, please contact us for the appropriate privacy statement that relates to your role).

3 What information do we process?

We process the following categories of personal data:

(A) For all users of our website:

Certain usage and technical information which is made available to us via our internet service provider. This information includes the IP and logical address of the server you are using, the top level domain name from which you access the internet (for example .ie, .com, etc.), the type of browser you are using, the date and time you access our site and the internet address linking to our site ("**User Information**").

(B) For registered members of our website:

Information you give us or which we receive or collect from your registration and use of our website ("**Registration Information**"). We collect your name, address, telephone number and the Congregational Province to which you belong. From time to time you may choose to provide us with additional personal data through the forum in our members' area, which is a restricted access section of our website ("the **Members' Area**"). The Members' Area is available exclusively to members of the Congregation who have registered with the Members' Area ("**Registered Members**"). As a Registered Member, the information you provide us with may include special categories of personal data. This is information that reveals certain sensitive details about an individual, including their religious or philosophical beliefs.

4 How do we use your information and on what legal bases do we rely?

(A) For all users of our website:

We process your User Information to analyse the usage of our site and to improve the experience of visitors to our site. In doing so we rely on the legal basis of pursuing the Congregation's legitimate interests of monitoring internet use and communications in order to manage its resources, plan for the future and protect its rights and those of its Users; and

We may also need to share your User Information if it necessary for us to comply with a legal obligation, to preserve or defend the Congregation's rights in court, to respond to law enforcement requests or discovery procedures, or where required or permitted by applicable laws, court orders, government regulations, or government authorities which will include lawful access by courts or governmental authorities outside your country of residence.

(B) For Registered Members:

In addition to the above, we process Registration Information for the purposes outlined below, except where restricted by law. In doing so, we rely on a number of separate and overlapping legal bases to lawfully process your personal data:

- **To provide and administer our website** to pursue the Congregation's legitimate interest in operating its website and in providing the Members' Area to our registered members, we will use the Registration Information you provide to create your account and profile within the Members Area. The Members Area is a restricted access section of our website that is available exclusively to registered members of the Congregation.
- **To contact you about your membership** to pursue the Congregation's legitimate interest in operating its website and in providing the Members' Area to our registered members, we will use the Registration Information to contact you for the purpose of sending you information and updates relating to your membership.
- For security purposes and fraud prevention purposes to comply with our legal obligations and to pursue the Congregation's legitimate activities in keeping the information we hold secure, we may use your personal data to keep our systems and Users safe, if necessary.
- Special categories of personal data we may process special categories of your personal data, including information that reveals details of your religious or philosophical beliefs, in order to manage your membership of our website. We may do so on the basis that we are doing so in the course of the Congregation's legitimate activities as a not-for-profit organisation with a religious aim where the processing relates solely to members of the Congregation and this data will not disclosed outside the Congregation without your consent. We may also have to disclose this data outside the Congregation to preserve or defend the Congregation's rights in court, to respond to law enforcement requests or discovery procedures, or where required or permitted by applicable laws, court orders, government regulations, or government authorities which will include lawful access by courts or governmental authorities outside your country of residence.

5 How do we share your information?

We keep your information private. We don't sell your personal data. However, in limited circumstances we may share your information with third parties. These are set out below:

- With our service providers: To a limited extent, we may share personal data with our service providers, particularly where this is necessary to provide our website to you. These service providers will be obliged to keep your personal data confidential, safe and secure.
- For legal and safety reasons: We may provide information to a third party if we believe in good faith that we are required to do so for legal reasons.

6 How long do we keep your personal data?

(A) For all users of our website:

We will keep your information in accordance with applicable legal requirements, and only for as long as necessary for the purposes described in section 3 or as long as required by law or to defend potential legal claims.

(B) For Registered Members:

You can delete your account at any time. To do this, please follow the steps set out at section 7, or send an email to <u>mercy@csm.ie</u>. It generally takes us about 30 days to delete your personal data fully.

7 How do we keep personal data secure?

(A) For all users of our website:

We take our security responsibilities seriously and deploy appropriate organisational and technical security measures to keep personal data secure. We review our security policy regularly.

(B) For Registered Members:

Please play your part in keeping your personal data secure by choosing a strong password.

8 What are your rights?

You have the right to obtain a copy of your personal data in an easily accessible format. In certain circumstances, you also have the right to object to the processing of your personal data, to request the amendment or deletion of your personal data and to withdraw your consent to the processing of your personal data (where we are relying on consent as the legal basis for processing your personal data).

Without prejudice to any other rights you may have, you may file a complaint with the Irish Data Protection Commission. The Commission's website is <u>www.dataprotection.ie</u>.

Registered Members can amend their account details or delete their account at any time by taking the following steps:

- Go to "Edit Profile" on the main top menu
- At the bottom of the page, select "Delete Account"
- Confirm your password

If you would like to exercise any of your rights or you have any questions about your rights please email us at mercy@csm.ie. Alternatively, you can contact us by telephone or post using the contact details available below.

9 How do we use personal data if you use the form on our "Contact us" page

If you provide us with your name, email address or any other personal data on our contact us page, we will use this data to contact you, if necessary, to respond to your query. We will not use the personal data you provide us with on the "Contact us" page for any other purpose and we will only hold this information for so long as is necessary to fulfil this purpose or for a longer period if we are required to do so by law.

10 International Transfers

We do not transfer your personal data outside of the European Economic Area.

11 Contacting Us

If you have any questions regarding this Privacy Statement or our use of your personal data, please contact us using the following information:

Web:	https://www.sistersofmercy.ie/contactus
Email:	mercy@csm.ie
Telephone:	01-4673737
Postal Address:	Privacy Office, Rachamim, 13/14 Moyle Park, Clondalkin, Dublin 22, D22 NY99, Ireland

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