



# CBM Ireland Donor Data Retention Privacy Statement

V2: March 6th, 2024

## Privacy Statement

This privacy statement sets out how Christian Blind Mission Ireland (CBM Ireland) gathers, stores and uses your personal data. We know that your personal data is very important and ensure that we keep it secure and minimise use of your data in compliance with best practice.

The purpose of this policy is to outline your rights and our responsibilities under the Data Protection Act 1988, the Data Protection (Amendment) Act 2003 and the General Data Protection Regulation 2018 (GDPR). CBM Ireland is committed to complying with its legal obligations with regard to data protection legislation.

If you have any questions about this Privacy Statement or our Data Protection policies, you can contact the data protection officer at [info@cbm.ie](mailto:info@cbm.ie) or call us on 01 873 0300. We are always happy to receive post at 176 Ivy Exchange, Granby Place, Dublin 1.

CBM Ireland has a nominated Data Protection Officer, and this role is filled by the CBM Ireland Finance Manager. Any queries or concerns will be directed to the Data Protection Officer.

## Who We Are

CBM Ireland is a fully registered Irish charity with the CHY Number: 14987, Registered Charity Number: 20050405. CBM Ireland was set up in 2002 and is based in Dublin. You can find our contact details at the start of the Privacy Statement.

## General statement

CBM Ireland fully respects your right to privacy and will not collect any personal information about you without your clear permission or without having a valid basis for processing that information. Any personal information which you volunteer will be treated with the highest standards of security and confidentiality, strictly in accordance with recognised international standards and good practices.

CBM Ireland is committed to protecting your personal data and will comply with all applicable legislation including the General Data Protection Regulation ("GDPR"), and the Privacy and Electronic Communications Regulations 2003

## Collection and use of personal information

Like all charities we depend on donations and constant fundraising and naturally have a donor database to accurate record and securely store information. We have discussed this at board level and

are happy that the legitimate interests of our clients in extreme poverty serve as a legal basis for processing donor's data for direct marketing purposes. We have balanced your rights with this legitimate interest and having taken proper professional advice are sure that we can operate in this way while still protecting your fundamental rights to privacy.

CBM Ireland collects a donor history that contains personal information such as names, addresses, telephone numbers and email address of our donors. We may also have financial details and PPS number, depending on how you donated to us. If you responded to a survey, we have a record of your answers to the questions. We use this personal data for our fundraising to support delivery of our services to those in need. For example, we segment our donor database using the data above to target fundraising campaigns to specific areas or to specific groups of people. As all times we are careful to respect your data protection rights.

## Your rights with regard to your information

You have rights under Irish Data Protection legislation, with regard to our processing of your data. You can exercise these rights at any time by contacting us via email [info@cbm.ie](mailto:info@cbm.ie) or in writing at: The Data Protection Officer, CBM Ireland, 176 Ivy Exchange, Granby Place, Dublin 1.

You have the right to access personal data we hold which relates to you, including how we acquired such data, and the purposes for which it is being used. This right requires that you will be given a copy of your personal data which you may have supplied to us via the Site or in other correspondence and interactions.

To exercise this right, you must make your request in writing, posting it to our address as specified above. You have the right to have inaccurate personal data corrected. If you discover that we hold inaccurate personal data about you, you have a right to instruct us to correct that information. Such an instruction must be in writing and must contain evidence of the correct information. We will respond as soon as possible, and in any event within one month from the date on which your instructions are received.

Furthermore, we will share your corrective instructions with any organisation with whom the incorrect information has been shared in the 12 months prior to the date of your instructions.

In certain circumstances, you have the 'Right to be Forgotten'. This means that you can request that CBM Ireland removes any and all references to you from our records and systems. We will comply with all such requests in a timely manner, as required by the Data Protection Regulation, unless other operational or legal obligations require us to retain such data for a particular purpose or period of time.

You have the right, at all times, to restrict or object to processing of your personal data which you find intrusive, excessive or unwarranted. CBM Ireland will respect your right to do so, but may need to continue such processing where required to do so by law, or within the terms of an existing contractual arrangement.

If you feel your personal data has been processed inappropriately, please let us know and we will do everything we can to rectify the situation. You have the right to lodge a complaint with the Irish Office of the Data Protection Commissioner if you feel your rights or freedoms have been infringed upon.

## Exercising your Rights as a Data Subject

As a Data Subject you have a variety of rights under EU law. These include:

- The Right to be told if data about you is being processed, and for what purpose
- The Right to receive a copy of all data CBM Ireland holds about you
- The Right to object to your data being processed for a given purpose
- The Right to object to your data being included in any form of data profiling
- The right to have errors in the data we hold about you corrected
- The right to have data about you deleted, except where we have a valid overriding reason for keeping it. You can opt-out of any use of your data at any time by contacting our data protection officer through [info@cbm.ie](mailto:info@cbm.ie).

## Fundraising Appeals

We conduct fundraising appeals by direct postal mail, by email, and by telephone.

If you have provided us with your postal address, we will contact you by post in relation to fundraising unless you opt-out.

We gather telephone and email information from donors by an optional field that you can fill in on a donation form. As stated on this form, by filling in your phone and email you are consenting to be contacted by CBM Ireland in this way.

If you have given us your email address we may also use it to match you against statistical profiles in Facebook or other services in a practice known as remarketing so you will be more likely to see information about the CBM Ireland in your Facebook Timeline, and so people who share your characteristics on those platforms will be more likely to see our fundraising calls to action as well. To have your email address excluded from this processing, please contact us at [info@cbm.ie](mailto:info@cbm.ie)

## Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Where we transfer, store or otherwise process personal data outside the EEA we will ensure appropriate safeguards, contractual or otherwise, are in place and are in compliance with applicable data protection law. By submitting your personal data for such purposes, you agree to this transfer, storing or processing. CBM Ireland will take all reasonable steps necessary to ensure that your personal data is processed securely and in accordance with this Privacy Statement.

## Data Retention Policy

Occasionally we have been contacted by legal representatives of the estates of deceased to find out if that person donated to us when they were alive. This can arise when there is an unclear clause in a Will. As such we will hold your details indefinitely, unless you opt out. It is easy to opt out, just contact us via one of the methods set out above.

## Tax Reclaim

If you have personally given €250 or more in a calendar year your donation(s) may be eligible for tax reclaim from the Revenue Commissioners of up to an additional 45% of the total value at no cost to you. We will contact you by post with information that will allow us to submit a claim unless you opt-out. If you return a form to us with a PPS number, then we will keep this on file for the duration that the tax clearance certification is in date.

## Events

We occasionally run events to raise awareness of our programmes and to raise much needed funds. If you have given us your email address, postal address, or telephone number we may use them to let you know about events and remind you about them if:

- For postal addresses, you are not opted-out of receiving postal communication about events.
- For telephone and email addresses, if you are opted in to receiving messages about events or have attended a similar event in the past.

## Newsletters

CBM Ireland sends out occasional newsletters to keep our donors updated about how we are working on achieving our goals in developing countries. These newsletters are sent by post, and you can always opt out of receiving them by contacting us.

## Conducting Surveys of Donors and Supporters

We will send donor surveys by post from time to time to get feedback, improve communications and update donor details. If you have given your phone or email to CBM Ireland, we may contact you in these ways about donor surveys in the future, unless you opt out.

## Leaving A Legacy

From time to time, we will communicate with existing donors and supporters about the benefits of leaving a legacy and remembering CBM Ireland in their Will. This is a type of fundraising appeal, and we will use your email address, postal address, or telephone number where appropriate to contact you for that purpose.

You can opt-out of receiving information about leaving a legacy at any time by contacting us.

## Saying Thank You

We're very grateful to our donors. That's why we like to send thank you letters by post or email every so often to remind you how much we value your contributions.

You can opt-out of receiving Thank You letters by contacting us.

It is a CBM Ireland tradition to send birthday cards to donors who have given us their date of birth. Naturally you can opt out at any time.

## Statistical Analysis of Donors

To help us ensure that our fundraising campaigns are efficient, effective, and not annoying to people, we may conduct statistical analysis of donors using a variety of demographic profile data obtained from third parties such as the CSO and Facebook. This helps us identify how best to use our resources as efficiently as possible and how to minimise the annoyance to our donors and supporters that can be caused by too frequent requests for support.

This analysis is carried out on anonymised data sets and donors and supporters are then matched to specific categories called “segments”. These segments are used to help support fundraising campaign planning and execution.

You can ask to be excluded from this type of analysis by contacting us, but you may receive a greater number of fundraising requests than otherwise, or you may receive communications from us that might not be relevant to you or your lifestyle and donation history.

## Use of Third Parties

We can't do everything ourselves and must contract out certain tasks to third parties. These include:

- Payment Processing Services (Realex)
- Marketing Agencies
- Postal Mail Marketing companies

We often have to share the minimum amount of your personal data with these organisations required for the task or project. This sharing is always undertaken in a manner compliant with the GDPR and third parties undertake to protect the security and integrity of personal data. We only use well established and reputable third parties.

## Obtaining Data from 3rd Parties

In line with standard practice in marketing and fundraising, CBM Ireland may, from time to time, acquire data from 3rd party brokers for the purposes of conducting fundraising campaigns. These brokers undertake and warrant to us in their contracts that they have obtained this data fairly and in compliance with Data Protection laws.

## Cookie Policy

We also collect general information about visitors to our website using cookies, including which web pages they look at and for how long. This helps us make our website better and more relevant for visitors. This information is anonymous and cannot be used to identify people.