



**Mental Health Reform**  
Promoting Improved Mental Health Services

# Privacy Policy

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## 1. About Mental Health Reform

Mental Health Reform (MHR) is the national coalition on mental health in Ireland. MHR's membership represents a broad range of interests, including housing, disability, children's rights, human rights and ethnic minorities. MHR provides a unified voice to drive progressive reform of mental health services and supports in Ireland.

The Board of Directors are responsible for approving this policy and ensuring that it is adhered to.

## 2. Terms used in this policy

**Data protection** is the means by which the privacy rights of individuals are safeguarded in relation to the processing of their personal data. The Data Protection Acts 1988 and 2003 confer rights on individuals as well as placing obligations on those entities processing personal data.

**Personal data** is data relating to an identified or identifiable natural person ('data subject'). It is a broad term and includes a wide range of data. It includes online identifiers such as IP addresses and cookie identifiers.

**Special categories of personal data** means data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

**Data processing** is a very broad concept and includes almost anything you can do with personal data, including collection, storage, use, disclosure and destruction.

**Data retention** is the length of time for which personal data will be kept and the reasons why the data is being retained. In determining appropriate retention periods, regard must be had for any statutory obligations imposed on a data controller.

**Data controller** is the legal person who, alone or jointly with others, determines the purpose and means of the processing of personal data. In other words, 'what personal data will be processed for and 'how' it will be done. For the purpose of the Data Protection Acts 1988 and 2003 (as amended) (the 'DPA') and from 25 May 2018, the General Data Protection Regulation (the 'GDPR'), the data controller is Mental Health Reform.

**Data processor** means the legal person such as an individual or a company who processes personal data on behalf of MHR. For example, the payroll provider used by us and data cloud providers MHR use (eg. Salesforce, Mailchimp).

MHR will process any personal data provided to it by individuals, whether it be provided through our website, in person, by any form, correspondence, telephone, email or by any other means, or otherwise held by us in relation to you in the manner set out in this policy.

By submitting your data to us and or by using the MHR website you confirm your consent to the use of your personal data as set out by this Privacy Policy.

If you do not agree with the terms of this Privacy Policy, please do not use the website or provide us with any personal data.

### **3. How do we collect your data**

You directly provide MHR with most of the data we collect. We collect and process data when you:

- Corresponding with MHR by letter, telephone, e-mail or in person;
- Subscribing to the MHR newsletter;
- Registering for a MHR event;
- Applying for membership of MHR;
- Donating to MHR;
- Applying to work with MHR as an employee or volunteer;
- Visit the MHR website.

This data may include traffic data, location data, blogs and other communication data in accordance with MHR's Cookie Policy that may identify personal data and data of an anonymised or technical nature.

MHR will only ever ask you to disclose only as much data as is necessary for the purpose of your interaction with us.

### **4. What are cookies**

Cookies small text file that is placed on your device by a server and allows websites or mobile applications to respond to you as an individual. You can choose to accept or decline cookies.

Please refer to your internet browser instructions to specify your cookie preferences. If you decline cookie features, you may not be able to fully experience the interactive features on our website. For more information on how we use cookies, please refer to our Cookie Policy which is available on our website.

### **5. Why MHR collect this data**

MHR collects the data in order to function effectively as an organisation; to communicate with our membership; to campaign and fundraise, to improve our MHR website; to recruit staff and volunteers; to host events and to undertake research.

### **6. How MHR will use this data**

MHR will use this data to:

- process any enquiry from you;
- liaise with you about projects that MHR is undertaking with you;
- comply with obligations arising from a contract entered into between you and MHR;
- register you for an MHR event;

- provide you with news about MHR's work;
- process a membership application from you;
- set up, operate and manage any marketing or fundraising services subject to your explicit consent;
- comply with our legal duties and responsibilities;
- provide security to, and ensuring the health and safety of, employees, volunteers and visitors to company premises;
- administer and improve the MHR website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- as part of our efforts to keep our website safe and secure; and
- to make suggestions and recommendations to you and other users of our website about services that may interest you or them.

The legal bases for the processing of your data are:

- That you have provided consent for the processing for one or more specific purposes; or
- The processing is necessary for the performance of a contract which you have entered into with MHR or to take steps at your request prior to entering into a contract; or
- The processing is necessary to comply with a legal obligation to which MHR are subject.
- MHR does not engage in any automated decision making processes nor do MHR use any personal data as a basis for any such automated decisions.

## **7. Disclosure of your data**

MHR may also share your data with selected third parties including, business partners, suppliers and sub-contractors for the performance of any contract MHR enter into with them or you and to assist us in fulfilling our functions such as:

- Cloud computing services;
- Customer Relationship Management (CRM) service providers;
- Archive or confidential shredding companies;
- Data and Communications Technology service providers

## **8. How long MHR retain your data**

The time periods for which MHR retain your data depends on the type of data and the purposes for which MHR use it. MHR will keep your data for no longer than is required or permitted. For further information, please see MHR ***Data Protection Policy***.

MHR does not transfer your data outside of the EU.

## 9. Your rights with respect to your personal data

You have the following rights:

- **The right to access** - You have the right to request copies of the personal data MHR hold about you;
- **The right to rectification** - You have the right to request that MHR correct any information that you believe is inaccurate without undue delay;
- **The right to erase** – You have the right to request that MHR erase your personal data, in circumstances where it is no longer necessary for us to hold the data for your use of our services or if you have withdrawn your consent to the processing;
- **The right to object to processing** - You have the right to object to MHR processing your personal data, in circumstances as processing for profiling or direct marketing;
- **The right to data portability** - You have the right to request that MHR provide your data to you in a portable format or, where technically feasible, for us to port that data to another provider provided it does not result in a disclosure of data relating to other people; and
- **The right to restrict processing** – You have the right to request that MHR restrict the processing of your data.

When MHR processing of your data is based on your consent to that processing, you have the right to withdraw that consent at any time but any processing that MHR have carried out before you withdrew your consent remains lawful.

If you make a request, we have one month to respond to you. You may exercise any of the above rights by writing to:

**Operations and Office Coordinator**  
Mental Health Reform  
Coleraine House  
Coleraine Street  
Dublin 7  
Email: [info@mentalhealthreform.ie](mailto:info@mentalhealthreform.ie)

## 10. Right to contact the appropriate authority

If you are dissatisfied with how our organisation has managed your personal data, you have the right to lodge a complaint with the Data Protection Commission.

The Data Protection Commission can be contacted at [www.dataprotection.ie](http://www.dataprotection.ie) and by calling 01 7650100 / 1800 437 737

## 11. Security of your Personal Data

MHR takes all reasonable steps to secure your personal data from unauthorized access, use or disclosure and secures the personally identifiable data you provide on computer servers in a controlled, secure environment, protected from unauthorized

access, use or disclosure. When personal data (such as a credit card number) is transmitted to other websites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

## **12. Revisions**

Any revisions to this policy will be posted on [www.mentalhealthreform.ie](http://www.mentalhealthreform.ie) and will be effective when posted.

Please review this notice each time you use MHR's website or other MHR services.

## **13. How to contact us**

If you have any questions about our privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights don't hesitate to contact us.

Mental Health Reform  
Coleraine House  
Coleraine Street  
Dublin 7

Tel: 01 8749468

Email [info@mentalhealthreform.ie](mailto:info@mentalhealthreform.ie)