



Privacy Statement for the purpose of FLAC Clinics

Introduction

This Privacy Statement tells you how FLAC (Free Legal Advice Centres) processes your personal data when you use our FLAC Clinics. FLAC clinics are a free confidential service that provide first stop, basic legal information, advice and referral. Volunteer lawyers deliver the service.

If you use one of our other services, please see the data protection portal on our website for details of how FLAC processes your personal data when you use those services.

In this statement, we outline:

- the types of data we collect
- how we use your data
- your rights in relation to the data we hold about you
- how long we hold your data for
- how to contact us if you have any questions about your data or if you have any complaints.

This statement may be subject to changes from time to time. If we make any changes, we will post those changes here and update the “Last Updated” date at the bottom of this statement. We encourage you to periodically review this notice for the latest information on our privacy practices.

FLAC is a 'data controller'

We control personal data and this means we are a 'data controller'. FLAC is the data controller of the types of personal data about people described in this statement.

Our contact details

Address: FLAC (Free Legal
 Advice Centres),
 85/86 Dorset Street
 Upper,
 Dublin 1,
 Ireland

Phone: 01 8873600

Email: info@flac.ie

About FLAC

FLAC is an independent human rights organisation dedicated to the realisation of equal access to justice. We operate through a company called 'Free Legal Advice Centres', which is registered as a charity (registered charity number CHY6097, place of registration: Dublin, Ireland). Throughout the document references to 'FLAC', 'us', 'our' and 'we' refer to the Free Legal Advice Centres Limited.

Legislation

We will process all data in line with the relevant data protection laws and principles. These include the:

- General Data Protection Regulation (GDPR)
- Data Protection Act 2018 (DPA).

Data we collect

The next table outlines the categories and types of data we collect. The types of data we collect may change over time. The table shows you the typical types of data we collect.

Making Bookings and Providing Clinics	
Types of Data	Legal Basis
<p>In order to make an appointment we collect the following data:</p> <ul style="list-style-type: none"> • your full name and contact telephone number • a short synopsis of your query • any other information you provide which relates to your query, including any documentation. <p>We will then process any personal data that you provide in the course of your appointment.</p>	<p>It is necessary for our legitimate interests in providing our free legal advice clinics, including preparing the volunteer lawyer for their appointment with you in order to provide the best possible advice and assistance.</p>
<p>The information you provide in describing your query may include sensitive personal data (such as information in relation to your health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life or sexual orientation) and will be treated in the strictest of confidence. All sensitive personal data is voluntary and you do not have to provide this.</p>	<p>Our processing of sensitive personal data is set out in the Section 47 of the Data Protection Act 2018, which permits the processing of sensitive personal data for the purposes of providing legal advice.</p>
<p>In rare circumstances, and only where the information is voluntarily provided by you, we may process information about criminal convictions and offences.</p>	<p>Our processing of criminal conviction data is set out in Section 55 of the Data Protection Act 2018, which permits the processing of criminal conviction data for the purpose of providing legal advice.</p>

Storing a record of your query for monitoring, research, funding and training purposes	
Types of Data	Legal Basis
We store the date and time of your appointment, the area of law that your query relates to, and generalised demographic details (e.g. gender, age range). However, we will remove your name and contact details.	It is necessary for our legitimate interests in monitoring the provision of our free legal advice clinics, improving our service and demonstrating that we are meeting the requirements of our funders.

Monitoring our service to identify unmet legal needs, including areas of high demand and change in trends	
Types of Data	Legal Basis
We anonymise details of the legal queries that arise in each consultation, and information that is recorded by our volunteers in relation to those legal queries.	It is necessary for our legitimate interests in establishing the level of unmet legal needs that we are addressing. We rely on Section 54 of the Data Protection Act 2018 as the legal basis for our anonymisation of sensitive data that might be included in your legal query.

In certain circumstances our volunteers may identify that your legal query could form the basis of further FLAC casework	
Types of Data	Legal Basis
Your name, contact details and details of your legal query	It is necessary for our legitimate interests in identifying legal queries that could form the basis of further FLAC casework. Our processing of sensitive personal data is set out in the Section 47 of the Data Protection Act 2018, which permits the

	<p>processing of sensitive personal data for the purposes of providing legal advice.</p> <p>Our processing of criminal conviction data is set out in Section 55 of the Data Protection Act 2018, which permits the processing of criminal conviction data for the purpose of providing legal advice.</p>
<p>Please note that our volunteer will inform you that they are intending to make a referral, which may or may not result in FLAC making further contact with you in relation to your legal issue. If you do not want to be contacted, you may inform the volunteer.</p>	

<p>If you are not using our service in accordance with our policies (e.g. in connection with requests for repeat appointments) we may keep a record of this in order to manage your future interactions with the service to and to uphold our policies.</p>	
Types of Data	Legal Basis
<p>Your name, contact details and details about the use of our service</p>	<p>It is necessary for our legitimate interests in ensuring the safe and fair operation of our service.</p>

<p>We may contact you after the clinic to seek your feedback</p>	
Types of Data	Legal Basis
<p>Your contact details are used to send you the feedback form.</p> <p>We do not directly associate your feedback with your name and contact details.</p> <p>However, if you request us to follow up with you about your feedback (e.g. to re-arrange a missed appointment) we will use your name and contact details for this purpose.</p>	<p>Our legitimate interests in monitoring and improving our services.</p>

If you do not want to be contacted, you can let us know at any time (including when you book an appointment)

With whom we share data

Your information will be shared with a FLAC volunteer lawyer, who will meet you at your appointment or call you at the scheduled time.

We also use certain third party IT service providers to support our operations and host the personal data that we process to provide our services.

Keeping your data

If you take part in a remote clinic, once the call is over, the volunteer lawyer will delete and destroy your personal information within 24 hours. Where you take part in an in-person clinic the volunteer returns any copies of your personal information at the end of the clinic. We will not hold your personal data for longer than is necessary. We retain your personal data for as long as we need it for the purposes described in this privacy notice, or to comply with our obligations under applicable law and, if relevant, to deal with any claim or dispute that might arise between you and us.

Bookings Made Through Third Parties

Please note that third parties like the Citizen's Information Service who facilitate bookings are separate controllers of your personal data. These third parties will provide you with information on how they process your personal data when you make your booking. For example, the Citizens Information Services makes a Data Protection & Privacy Statement available on its website at www.citizensinformation.ie.

Your rights

You have the following rights in relation to your data. You can send us a request about any of the rights outlined below. We will do our best to handle your request as soon as possible and within one month. However, restrictions may apply in certain situations.

‘Access’ your data

You have the right to know certain things about how we use your data, including:

- what data we hold about you
- why we hold the data
- how we are using the data.

You also have a right to receive a copy of the data that we hold about you.

When sending us a request, please give us as much information as you can. This will help us to identify the data you wish to access. For example, give specific dates.

‘Rectification’ – correct your data

You have a right to ask us to keep data that we hold about you up to date and accurate.

Where data is inaccurate or incomplete, we encourage you to contact us to have this data corrected. When we receive your request, we will make sure that the data is corrected and as up to date as soon as is reasonably possible.

‘Erasure’ – have your data removed from our records

In certain circumstances, you have the right to request us to delete personal data that we hold about you. This is sometimes referred to as the right to be forgotten.

‘Object’ – you can object to us using your data

In certain circumstances, you have the right to object to the further use of your data.

‘Restriction’ – challenge how we use your data

If you ask us to limit how we use your data, we will do so if the following circumstances apply. You tell us:

- the data we hold about you is inaccurate – we will restrict use of your data until we update it
- FLAC no longer needs the data, but you need it for legal reasons
- you have already lodged an objection to us about using your data and we are still considering your objection.

You may also argue that processing your data is unlawful.

You may be against us deleting your data but ask us to restrict its use instead.

If using your data has been restricted, we will use your data only:

- with your consent
- to establish, exercise or defend legal claims
- to protect the rights of other people
- for reasons important to public interest.

If we agree to restrict your data, we will contact you to confirm that we have carried out your request.

‘Portability’ – you can reuse data in more than one organisation

You have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, commonly used machine readable format.

Right to withdraw consent

If we are storing or using your data and you have given your legal consent for us to do so, you can withdraw your consent at any time.

Right to complain

If you are unhappy with how we use your data or by our response to any requests by you to exercise your rights, then you have the right to complain to the Data Protection Commission.

Where to complain

Address	Data Protection Commission 21 Fitzwilliam Square South Dublin 2 D02 RD28 Ireland
Webform:	https://www.dataprotection.ie/docs/Contact-us/11.htm
Email:	info@dataprotection.ie

Where do I send requests? Our contact details

If you want to make a complaint or have any queries in relation to your data, please contact us.

Address: FLAC (Free Legal Advice
Centres),
85/86 Dorset Street
Upper,
Dublin 1,
Ireland

Phone: 01 8873600

Email: data@flac.ie

Please email all your requests to data@flac.ie giving us as much detail as possible about the data you require. This will allow us to deal with your request efficiently. To answer your request, we may ask you to prove your identity.

How long will a request take to complete?

Once we receive your request, we have one month to respond. We may extend this by two further months if needed. If we do need more time to deal with your request, we will contact you about the delay, within one month of receiving your request.

If we refuse your request, we will let you know within one month of receiving your request and tell you why. You are entitled to contact the Data Protection Commission if we refuse your request.

How much does it cost to submit a request?

We only charge a fee for requests if we think they are unjustified or excessive. If that is the case, we may charge a reasonable fee or refuse the request.

We may also charge if you submit multiple requests or ask for multiple copies.