



Privacy Statement for the purpose of the Information & Referral Service

Introduction

This Privacy Statement tells you how FLAC (Free Legal Advice Centres) processes your personal data when you use our Information & Referral Service (“IRS”). The IRS is a free confidential service that provides first stop, basic legal information and referrals to other voluntary bodies or state services.

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.

To provide legal information via the IRS, to record the enquiry has been received, and where necessary to refer you to another service	
Types of Data	Legal Basis
<p>To facilitate this service, we process the following data:</p> <ul style="list-style-type: none"> • the enquiry type (e.g. call, email) • your name, email address and/or contact telephone number • details of your query • details of the information provided in response to your query 	It is necessary for our legitimate interests in providing our information and referral service.
<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. This sensitive personal data is referred to as “special category data” for the purposes of the GDPR. All special category data is voluntary, and you do not have to provide this. In general, we prefer not to receive such data, but where it is unavoidable, we will process it only to the extent necessary to assist with the query.</p>	We will only process special categories of personal data where we have your explicit consent.
<p>In rare circumstances, and only where the information is provided by you, we may</p>	We will only process data relating to criminal convictions based on your explicit consent.

<p>process information about criminal convictions and offences.</p> <p>In general, we prefer not to receive such data, but where it is unavoidable, we will process it only to the extent necessary to assist with the query.</p>	
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To process referrals and requests from a variety of non-governmental organisations (“NGOs”) and Citizens Information Centres (“CICs”), including requests for affidavits	
Types of Data	Legal Basis
<p>In some limited circumstances, we may process the following data:</p> <ul style="list-style-type: none"> • your name, contact telephone number and email address • details of the query • details of the information provided in response to your query • details in any affidavits that are provided • any other information you provide which relates to your query, including any documentation. 	<p>Our legitimate interests in dealing with referrals and requests from NGOs in order to provide the best possible advice and assistance.</p>
<p>The information provided by the referring NGO 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. This sensitive</p>	<p>We will only process special categories of personal data where we have your explicit consent. We will only process special categories of personal information in limited circumstances, based on consent and your consent may be withdrawn at any time.</p>

<p>personal data is referred to as “special category data” for the purposes of the GDPR. All special category data is voluntary, and you do not have to provide this.</p> <p>In general, we prefer not to receive such data, but where it is unavoidable, we will process it only to the extent necessary to assist with the query.</p>	
<p>In rare circumstances, and only where the information is provided by you, we may process information about criminal convictions and offences.</p> <p>In general, we prefer not to receive such data, but where it is unavoidable, we will process it only to the extent necessary to assist with the query.</p>	<p>We will only process data relating to criminal convictions based on your explicit consent.</p>

Monitoring our service to identify unmet legal needs, including areas of high demand and change in trends	
Types of Data	Legal Basis
<p>We keep details of the legal queries that arise, and information that is recorded in relation to those legal queries. We will not use your name and contact details for these purposes.</p>	<p>It is necessary for our legitimate interests in establishing the level of unmet legal needs that we are addressing.</p> <p>Where we process 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) or criminal conviction data for</p>

	these purposes, it will be on the basis of your explicit consent.
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Storing a record of your query for monitoring, research, funding and training purposes	
Types of Data	Legal Basis
We store the date of your query, the area of law that your query relates to, and generalised demographic details (e.g. gender, part of the country calling from, where you were referred to us from). We will not use your name and contact details for these purposes.	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.

With whom we share data

The IRS is staffed by employees of FLAC and volunteers. Your information may therefore be shared with volunteers solely for the purposes of providing the IRS. It may also be shared with any NGO that is also assisting you with your legal query.

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

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. In general, this means that we keep a record of each time you access the IRS for a period of 7 years.

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.

