

# SharingPoint Privacy Notice

This is the privacy notice of SharingPoint Company Limited by Guarantee. In this document, "we", "our", or "us" refers to SharingPoint. We are company number 359452 registered in Ireland. Our registered office is at 31 Westland Square, Dublin 2, Eircode: D02 AW71.

## **Introduction**

1. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
2. We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.
3. We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.
4. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
5. Our policy complies with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR).
6. The law requires us to tell you about your rights and our obligations to you with regards to the processing and control of your personal data. We do this by requesting that you read the information provided at [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org)
7. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

## **What are your rights?**

Data Protection and Privacy legislation provides you with a number of rights in relation to your personal data, these rights include:

- the right to be informed
- the right of access (Data Subject Access Request)
- the right to rectification
- the right to erasure
- the right to restrict processing
- the right to data portability
- the right to object to processing for certain purposes, and,
- rights in relation to automated decision making and profiling.; and
- the right to lodge a complaint with the Data Protection Commissioner's Office.

SharingPoint will:

- Ensure that your rights are met with respect to each of the rights listed above.
- Ensure that Data Subject Requests are properly authenticated and fulfilled within one calendar month.

### **The bases on which we process information about you:**

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If the basis changes then if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

#### **1. Information we process because we have a contractual obligation with you**

At present, our website does not collect data which requires that a contract be formed between you and us.

#### **2. Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website, use our Contact Form, make a donation or to ask us to provide you with more information about our services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

Sometimes you might give your consent implicitly, such as when you send us a message using the Contact Form, make a donation or send an e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists. You may withdraw your consent at any time by instructing us at [info@sharingpoint.ie](mailto:info@sharingpoint.ie). However, if you do so, you may not be able to use our website or our services further.

### **3. Information we process for the purposes of legitimate interests**

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so. Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so.

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our charity
- responding to unsolicited communication from you to which we believe you would expect a response
- processing a donation / payment made by you through our website
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage organisational risk
- protecting your interests where we believe we have a duty to do so.

#### **4. Information we process because we have a legal obligation to do so**

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

#### **Specific uses of information you provide to us:**

#### **5. Sending a message to our support team**

Aside from queries raised through the Contact Form or when making a donation, our website does not allow you to post information with a view to that information being read, copied, downloaded, or used by other people. It is not a publishing medium.

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need. We record your request and our reply in order to increase the efficiency of our charity.

We keep personally identifiable information associated with your message, such as your name and email address to be able to track our communications with you to provide a high-quality service.

#### **6. Complaints regarding content on our website**

If you complain about any of the content on our website, we shall investigate your complaint. If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate. If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

#### **Use of information we collect through automated systems when you visit our website:**

#### **7. Cookies**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with

a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

- 7.1. to track how you use our website
- 7.2. to record whether you have seen specific messages we display on our website
- 7.3. to keep you signed into our website

## **8. Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

## **Disclosure and sharing of your information:**

### **9. Sharing of Data with Third Parties**

We do not disclose your personal information to any third party (except as set out in this notice). Nor do we receive data that is made up from your personal information from any third parties.

## **10. Data processed outside the European Union**

Our websites are hosted in Ireland. Data obtained within Ireland is not processed outside the European Union.

### **Other matters:**

## **11. Use of site by children**

11.1. We do not provide services for children, nor do we market to children.

11.2. If you are under 18, you may use our website only with consent from a parent or guardian.

## **12. How you can complain**

12.1. If you are not happy with our privacy policy or if have any complaint, then you should tell us by email. Our address is [info@sharingpoint.ie](mailto:info@sharingpoint.ie)

12.2. You can find further information about our complaint handling procedure at [www.sharingpoint.ie](http://www.sharingpoint.ie)

12.3. If a dispute is not settled, then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

12.4. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Data Protection Commissioner. This can be done at:

<https://www.dataprotection.ie/docs/complaints/1592.htm>

## **13. Compliance with the law**

Our privacy policy has been compiled to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.

## **14. Review of this privacy policy**

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us:

[info@sharingpoint.ie](mailto:info@sharingpoint.ie)