**GDPR**

**Privacy Policy**

Clarity Ireland have prepared this policy for you to understand how and why we handles personal data. Under the General Data Protection Regulations, we are a “data controller”, as we collect and use personal data. We also use “data processors” who handle some of our data. We therefore have a number of responsibilities to protect our customers, suppliers and staff.

**What personal data do we hold?**

We collect and retain personal data for:

* Individuals who use our services.
* Suppliers of products and services.
* Staff

**What type of data do we hold?**

We hold the following data:

* Contact data for clients, suppliers and staff.
* Details of bookings for services, and a record of previous services used.
* Sensitive data related to bookings (such as health or personal circumstances) that may be relevant to attendance at one of our events.

We expressly do not hold:

* Banking or credit card data for clients unless given to us for a purpose (e.g. a reimbursement).
* Cookies or any means of tracking an individuals use of services on the internet other than through direct applications where the data is freely given.

**Where do we store personal data?**

Personal data, including sensitive data, for our clients is stored on a secure server, password protected that meets the highest standards. Personal data is available to administrative staff for routine processing. Sensitive data is held in a restricted area, and only accessed by staff for specific purposes.

We use a cloud-based accounting system called Quickbooks for payments and receipts. We will enter client and supplier details necessary to process payments on that system. You can read their privacy statement [here](https://security.intuit.com/index.php/privacy).

We use Paypal for card processing. We do not enter details of our clients on PayPal, but details entered for payments are available to us. You can read their privacy statement here.

**Who can see the data we hold?**

Personal data (not including sensitive data) may be viewed by:

* Third parties for the purposes of processing payments.

Personal sensitive data may be viewed by:

* A member of staff who is trained to assess individuals prior to acceptance on an event.
* A trainer or retreat lead, who needs to know of any relevant issues for an attendee on an event.
* A supervisor, where the supervisee has named that supervisor and given permission for their application to be viewed (same for PPM)

Personal sensitive data may **not**be viewed by a member of staff:

* For any purpose other than the above.
* If the individual is known personally to a staff member as a friend, family member of in another social context, unless express permission has been granted by individual for the staff member to see that information.

**Who do we share data with?**

We will comply with all legal and legislative obligations on personal data.

We will not share personal sensitive data with any third party.

We will share attendance information for participants on courses operated under the collaboration agreement with Jampa Ling, the Mindfulness Association and Greenage College for the delivery of Continuing Professional and Personal Development under the Teacher Training Pathway or as part of Introducing Mindfulness to Psychotherapy module.

**How do we communicate with people?**

When people enquire with us or apply for a service, we will restrict our communications to that service.

People will be offered the option to sign up to our newsletter service, and we will email those who do from time to time to advise of our activities and of other related activities that may be of interest.

We use social media to reach out to the general public. We do not harvest personal data from our social media sites.

**How long do we hold data?**

We hold personal data for the minimum amount of time necessary.

Unless there is a need to retain the data for longer, sensitive data will be deleted within three years of its use. During that period it will not be accessed without permission of the individual concerned.

We will delete data about an individual on request from that person, unless there is some legal obligation to retain that data.

**Questions**

If you have any questions or comments about our privacy policy, please email us on katisimpson@clarityireland.com

I have read and I am in agreement with the above

Name:

Date: