# **Privacy Policy**

## Overview

Enable Ireland is committed to protecting your privacy and the personal information you and others provide to us. This Privacy Notice outlines what we do with the personal information you provide to us for the AT Loan Library, why we gather it and what it means to you. This Notice outlines our approach to Data Protection to fulfil our obligations under the General Data Protection Regulation (GDPR).

In addition to this notice, please see <u>Enable Ireland's External Data Protection</u> <u>notice</u>.

## What Personal Information do we collect from you as AT Loan Library Member?

As a member of the AT Loan Library, the following limited information will be processed on the system:

- Full name (therapist)
- Work email
- Work Mobile Number
- Organisation Name
- Work Address
- Link to centre
- CHO area
- Network Team Name
- Adult Service Name
- Children's Service Name

## Where do we get this information from?

- We obtain personal data about you if you sign up and consent to become an AT Library member.
- The information collected is limited to the least amount of information required to operate the system.
- We get information from your use of our library services.
- Any information within correspondence or emails that you send directly to Enable Ireland regarding the AT Library.

## We collect information about you when you:

- Use the AT Library website
- Borrow, return, or reserve equipment through the library website
- Borrow, return, or reserve equipment through a library staff member

## Why do we collect this information?

We collect the information in order to provide you with the required service as an AT Library Member. This means as a library member, your data is processed for the provision of:

- 1. library services through the library management system
- 2. other library services, such as technical assistance for equipment

#### Where is the Library Management System we use?

The AT Library Platform is called V-Smart and is hosted by Axeill.

#### What is the legal basis for processing your personal data?

The legal bases for processing the personal data is consent. Keeping in line with GDPR principle of Data Minimisation the least amount of information is processed (see relevant section above). The processing will only be processed as set out in this Privacy Notice.

#### What is the data required for?

The data processed is required to:

- Complete library administration duties such as recording
- reserved, overdue or lost items. send out notifications
- concerning upcoming due dates or overdue items. control
- login and access to the AT Loan Library website.

Record accumulated loaning data to analyses equipment patterns for informed collection management (e.g. to inform future buying of equipment).

#### Will my data be shared?

Your personal data will not be shared with any third parties. Data may be aggregated and made completely anonymous (i.e. you will never be identified).

#### How long do we keep your information?

When we collect your personal information, the length of time we retain it is determined by several factors, including the purpose for which we use that information and our obligations under other laws.

After a period of 3 years of inactivity on your account, your data will be erased or where you request closing of membership/erasing of information.

The only exceptions to this are where:

- You have unreturned items;
- There are fines, costs of replacing or repairing items (in line with the <u>T&Cs of AT Library</u> <u>Loan membership</u>); Other laws direct the retention of same.); Other laws direct the retention of same.
- You exercise your right to have the information erased, and we do not need to hold it in connection with any of the reasons permitted or required under the law.

## What are Your Rights?

You have the following rights:

- The right to access the personal data we hold about you. Under the GDPR, we are obliged to respond to your access request without undue delay. In most instances, we will respond within 30 Days. If we are unable to deal with your request fully within 30 Days (due to the complexity or number of requests), we may extend this period by a further two calendar months. Should this be necessary, we will explain the reasons why. If you make your request electronically, we will, where possible, provide the relevant information electronically unless you ask us otherwise. Please complete the access request form available here or by requesting the information directly from the Data Protection Officer. We reserve the right not to have to respond to access requests that are excessive or manifestly unfound.
- The right to require us to rectify any inaccurate personal data about you without undue delay.
- The right to have us erase any personal data we hold about you in circumstances such as where it is no longer necessary for us to hold the personal data or, in some circumstances, if you have withdrawn your consent to the processing.
- The right to object to us processing personal data about you such as processing for profiling or direct marketing. The right to ask us to provide your personal data to you in a portable format or, where technically feasible, for us to port that personal data to another provider provided it does not result in a disclosure of personal data relating to other people.
- The right to request a restriction of the processing of your personal data.
- Where our processing of your personal data is based on your consent to that processing and where there is no other legal basis for processing, you have the right to withdraw that consent at any time but any processing that we have carried out before you withdrew your consent remains lawful.
- You may lodge a complaint with your local supervisory authority with respect to our processing of your personal data.
- The local Supervisory Authority in Ireland is the Data Protection Commission. The website is www.dataprotection.ie. A form called "raise a concern" is available on their website in this regard.

You may exercise any of the above rights by contacting the Data Protection & Compliance Officer of Enable Ireland at dpo@enableireland.ie or writing to Data Protection & Compliance Officer, Enable Ireland, Lavanagh Centre, Curraheen, Carrigrohane, Cork, T12 D768.

## Implications of not providing the required personal data?

Sharing personal Information with us is in both your interest and ours. We need information in order to:

- Provide our services.
- Manage our business for our legitimate interests.
- Comply with our legal obligations.

In order to operate the service, we have identified the least amount of information required. Where you do not consent (i.e. opt in to use the service) and provide the information required you will not be able to access the AT Loan Library.

As outlined in the previous section, this consent can be freely withdrawn at any time.

#### How to contact our Data Protection and Compliance Officer

If you have any questions about how your personal data is gathered, stored, shared or used, or if you wish to exercise any of your data rights, please contact our Data Protection Officer at:

By Email: dpo@enableireland.ie By phone: 085 1068100 By postal Address: Data Protection & Compliance Officer, Enable Ireland, Lavanagh Centre, Curraheen,Carrigrohane, Cork, T12 D768

#### **Changes to the Privacy Notice**

We will make changes to this notice from time to time. You will always find an <u>up-to-date version</u> <u>of this notice on our website here</u> and you can also ask the Data Protection & Compliance Officer for a copy of the most up-to-date notice. This notice was last updated on 04 April 2024.

#### **Cookie declaration**

#### What are cookies?

This website uses cookies. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the sites or service providers' systems to recognize your browser and capture and remember certain information. Further information on cookies can be found at <u>EU Login (europa.eu)</u>.

#### How do we use cookies?

We use cookies to compile anonymous data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

If you prefer, you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies via your browser settings. Like most websites, if you turn your cookies off, some of our services may not function properly. You can personalize the cookies you accept from our website:

- Necessary: No cookies are used.
- Site preferences: Uses a cookie to track and retain user's choice preferences.
- Analytics: Includes cookies for external analytics (i.e. Google Analytics)
- Marketing: Includes cookies for social sharing options (none).

#### Managing cookies

Cookies help us to ensure that our website is as good as it can be for our users. Cookies pose little threat to your privacy, but some people may want to turn them off.

You can adjust your cookie preferences on the library website by clicking on the Adjust Cookie Settings at the bottom of the library webpage.

For more information about removing cookies from your browser, you can visit this generic <u>Cookie Removal Guide</u>.