

Data Privacy Policy

1. Values

Thank you for trusting us with some information about you. We take that trust seriously and we want you to know how we use your information and why.

If you have queries about how we use your data, or comments or questions about this Policy, please do email us. The email address to use is set out in section 2 below.

Policy updates: We keep this Policy under regular review, and this page may be updated from time to time. Please come back here to check the latest version. This Policy was last updated on the date given in the final box in the table in section 2 below.

2. Who are we?

Name	Sustainable Water Network (SWAN)
Trading Name	Sustainable Water Network (SWAN)
Email address for official notices	info@swanireland.ie
Data Retention Period(s)	Ordinarily your details may be held for up to 10 years after last point of contact, but for newsletter databases, email address will be held until you ask to be removed. Additionally, we will hold onto employee and donor details for up to 7 years for legal, accounts, insurance or taxation purposes, but we will endeavour to maintain only those aspects of the data that are required to fulfil our legal obligations.
Date this Policy last updated	27 September 2018

3. Words with specific meanings

In this Policy, there are words and phrases that have a specific meaning or that we are using in a special way. They are:

“Personal data” – any information about an identifiable living human being.

“Process” – we “process” your personal data when we do anything with it, which might include: collecting, recording, organising, storing, adapting, altering, retrieving, using, combining, disclosing, or deleting it.

“Special category data” – personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life or sexual orientation, health, genetic or bio metric data.

“Data subject” - is any person whose personal data is being collected, held or processed.

4. What this policy describes

This policy describes how we will collect and use personal data about you.

We process information in relation to:

“General enquiries” – Any individual or group who contacts us for a specific purpose;

“Newsletter Subscribers” – individuals who sign up to receive our newsletter or calls to actions.

“Member organisations” – who are members of the SWAN network.

5. What information do we process, and WHY?

a. General enquiries

Most of the information we process comes from you. We process it so we can reply to you, and when you contact us again we know what you asked before, what you were sent, and what you told us.

We collect names, organisations, emails, websites, social media and phone details. We also record the means of communication you used and what prompted you to contact us.

If you sign up to a newsletter list, you will be sent what you asked for. We normally operate ‘double opt-in’ lists and you will need to reconfirm your subscription before anything is sent. You can unsubscribe at any time by clicking the unsubscribe button on any email.

You are not automatically subscribed to any other lists, but may be invited to join an appropriate one.

If we email you individually using our own email system, or respond to an email sent to us at any of our business email addresses, a copy of that email will also be stored.

If you make an enquiry via our website, we will keep details of that enquiry and response for our data retention period (See Section 2, Table, above).

We do not routinely keep special category data (See Section 3 above). To the extent we hold this, it was supplied or made publicly available by you.

b. Newsletter Subscribers

If you become a newsletter subscriber, we keep your contact details, which includes your name, email address and other information you gave us at the time, stored in a secure data management system. As a newsletter subscriber, we will send you periodic e-newsletters and calls to action. You have the ability to unsubscribe at any time and we will respond by promptly removing you from our e-newsletter mailing list.

c. Member organisations

We will make contact with you and your organisation using the contact details you supplied to us and, may also use another communication means which are freely available on your website or social media pages. Apart from these publicly available contacts, we will only make contact with the person and/or persons you have nominated as your organisation's representative.

We will contact you on a regular basis to keep you informed of SWAN news and / or other water related topics.

If we email you individually using our own email system, or respond to an email sent to us at any of our business email addresses, a copy of that email will also be stored.

If you make an enquiry via our website, we will keep details of that enquiry and response for our data retention period (See Section 2, Table, above).

We do not routinely keep special category data (See Section 3 above). To the extent we hold this, it was supplied or made publicly available by you.

6. Newsletters and automated emails

We monitor who opens what information in our newsletter lists. We do this, so we can see whether content is popular and generate more of it, or whether it is not read.

Existing subscribers may receive emails about specific issues relating to areas of interest you have already shown interest in. You can unsubscribe from these at any time.

From time to time, we contact individual email newsletter subscribers but it is extremely rare. This would normally be if something odd were going on and we wanted to check you could see and use the content or find out what was causing a problem.

7. Data sharing – 3rd parties

We do not sell or exchange your personal data with organisations who may want to sell you something or use your data for research or other purposes.

a. Platforms

We keep a list of the software platforms we use to run our business.

b. People

We have an outsourced support team for our own business which may include virtual assistants, web designers, IT support, sales and marketing, accounting and more. They have access to your data where they need it to provide the essential service.

For example, if we invoice you, our accountant needs to process the information in the invoice.

Your information/advice is held in the strictest confidence. Our team are all contracted to strict confidentiality clauses.

8. Where is your data located?

Like most small organisations, we do not have any tailor-made software; we use mainstream packages for everything from our subscriber records, to email, to accounting.

This means that some of your data may be held in the EEA, and some may be held in services in the USA (with suitable data privacy shields) or elsewhere. We have picked mainstream suppliers with appropriate security standards.

9. Retention periods

Your information will be kept for the length of time set out in our retention period (see section 2, Table, above).

We need to keep data subjects' (See Section 3 above) information long enough to satisfy Irish Revenue and our insurers.

If you subscribed to a newsletter or updates list, you will remain on the list(s) you joined until you unsubscribe from that list.

10. Your rights

You have the right to know what information we are collecting on you, and to amend it if it is inaccurate.

If you feel for some reason we have information we should not be keeping, or it is out of date or otherwise wrong, please let us know and we will take appropriate action.

If you want to know what information we have about you (if any) email us at the email address set out above and give us your name, email address(es) and, according to our data subject access policy, we will happily do a search and let you know what information we hold on you and how we are using it/have used it.

You have a "right to be forgotten" – but that does have some legal limits to it. If you want us to remove information about you, let us know. If you have been a subscriber, we may not be able to remove all data as we will have to ensure that we can continue to comply with legal, accounting, taxation and our insurer's requirements.

11. Complaints

If you have a complaint about the way we are handling your information or how we have responded to a request for information or removal, you can take this up in the first instance by emailing us at the email address set out above.

If we can't sort it out, the relevant supervisory authority for us is The Office of the Data Protection Commissioner. You can contact them [here](#).

12. Cookies

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This section describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the sites functionality

How We Use Cookies

We use cookies for a variety of reasons detailed below. Unfortunately in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of the site. Therefore it is recommended that you do not disable cookies.

The Cookies We Set

This site offers newsletter or email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users.

When you submit data through a form such as those found on the contact page cookies may be set to remember your user details for future correspondence.