



# Privacy Policy

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## 1 Scope and Purpose

Under GDPR legislation this document outlines to all data subjects, who interact with the DSPCA, under what conditions their data will be processed, how the DSPCA strives to ensure that the individual's privacy is respected at all times, who conducts the processing, what security features are in place, and what rights the data subject retains at all times. Above all, this document aims to ensure that transparency exists with respect to DSPCA's data processing.

If you have any questions in relation to this document or if you wish to exercise any of your rights concerning your personal data, please email us at [dataprotection@dspca.ie](mailto:dataprotection@dspca.ie).

Several websites are included in this privacy policy namely:

- Dublin Society for Prevention of Cruelty to Animals: <https://www.dspca.ie/>
- King of Paws Dog Training Activity: <http://www.kingofpaws.com/>
- DSPCA Veterinary Hospital: <http://www.vethospital.ie/>
- DSPCA Free Will Service: <http://www.dspcawills.com>

## 2 Who We Are

Throughout this document, the term "DSPCA", "we", or "our" will refer to the Dublin Society for Prevention of Cruelty to Animals (Incorporated) and to DSPCA Animal Shelter Limited.

Dublin Society for Prevention of Cruelty to Animals (Incorporated) details are as follows:

- Charity number: CHY1047
- Registered Company Number 3437
- Address: Mount Venus Road, Rathfarnham, Dublin 16

DSPCA Animal Shelter Limited is a wholly owned subsidiary of Dublin Society for Prevention of Cruelty to Animals (Incorporated). Its details are as follows:

- Registered Company Number 490877
- Address: Mount Venus Road, Rathfarnham, Dublin 16



### **3 What data do we collect and why do we collect it?**

We collect personal information relating to individuals as part of our everyday functions. The purpose for collecting this information varies, and therefore this section is separated in to a number of categories to provide additional clarity.

We require information such that we can complete the processing of your request. For this reason, we are using our legitimate interest to facilitate the request as the lawful basis for this processing.

#### 3.A – Website Users: Cookies

If you use our website (or any of the websites listed in section 1), then we will use cookies in order to identify that you are or have visited our site previously in accordance with our cookie policy which is found at this address: <https://www.dspca.ie/cookie-policy/>

#### 3.A.1 – Website User: Interaction for Donations

As a website user you will also have the opportunity to become a monthly or once off donor in which case we will ask you to enter your name, company name, e-mail, address, phone number, bank account or bank card details and we also allow you to inform us what kind of pets you currently have.

Direct Debit monthly donations will be collected through Allied Irish Bank and we will encrypt your bank details in transit and at rest. Bank Card donations will be collected through Realex who will encrypt and retain the Card details. The DSPCA will not retain your Card details.

We will apply for the funds according to your instructions and you have the right to cancel the monthly donation at any time, by contacting us. The DSPCA will hold the personal and animal data provided but not any details regarding your Bank Card.

#### 3.A.2 – Website User: Shopping on Line

The DSPCA offers a wide range of Food, Accessories and Vouchers to purchase on line. When you choose the items you wish to purchase you will be required to give your name, address, phone number, e-mail and bank card details. You are also asked for your company name but this is optional.



Bank Card donations will be collected through Realex who will encrypt and retain the Card details. The DSPCA will hold the personal data provided but not any details regarding your Bank Card.

### 3.A.3 – Website User: Sponsor A Pet

The DSPCA offers an opportunity to sponsor a pet, for a year, online. When you choose the pet or pets you wish to sponsor you will be required to give your name, address, phone number, e-mail and bank card details. You are also asked for your company name but this is optional. There is an opportunity to give sponsorship as a present, in that case we will need the name and address of the recipient.

Bank Card donations will be collected through Realex who will encrypt and retain the Card details. The DSPCA will hold the personal data provided but not any details regarding your Bank Card.

### 3.A.4 – Website User: Junior Member

The DSPCA offers Junior Membership on line. When you select this option you will be required to give the name of the junior Member, their e-mail, date of birth, your address, the junior member's parent's e-mail, their parent's address, their phone number and their bank card details. You are also asked for your company name but this is optional.

Bank Card donations will be collected through Realex who will encrypt and retain the Card details. The DSPCA will hold the personal data but not any details regarding your Bank Card.

### 3.A.5 – Website User: Pet Boarding and Doggie Day Care

The DSPCA offers information on Boarding and Day Care facilities through the website.

When you select this option you will be asked if you wish to receive their newsletter. If you select to do so you will be asked for your name, e-mail and type of pet.

Further if you wish to start the booking procedure for Pet Boarding or Doggie Day Care you can download, complete, and return to [petboarding@dspca.ie](mailto:petboarding@dspca.ie) or post them to the DSPCA, Mount Venus Road, Dublin 16. You will be asked



to give your name, address, phone numbers, and e-mail. You are also asked for the following details about your pet, their name, secondary owner if any, type of animal, the pet's date of birth, age, sex, breed, colour, neutered, previously boarded, health history, habits, type of food and treats.

You will also be asked for the name address and phone number of the Veterinary Practice where your pet is registered. Finally, you will be required to give two emergency contact's names, and phone numbers. Please make sure all these people understand why their information is required, their obligations and agree to their information being given to the DSPCA.

There is also an online booking facility which requires the same information as above. No payment is required until the booking is confirmed.

### 3.A.6 – Website User: Attendees at Events and Activities

If you attend our activities or events, you may have completed a registration form online, through the Website, Constant Contact or Eventbrite. We will always strive to collect the minimum information required from you to ensure that we can efficiently and safely operate the activity or event itself. Typical examples of such information may be your name, your address, your e-mail address and your telephone number. Of course there may be activities or events for which we will require some additional information or payment. In which case we will make sure that we inform you why any such information may be required.

Regarding payment, Bank Card details will be required and processed through Eventbrite or Realex. The DSPCA will hold the personal data but not hold any details regarding your Bank Card.

### 3.A.7 – Website User: Volunteering

The DSPCA is more than happy to use the services of Volunteers in various areas of our operations.

When visiting the website, you will be advised that you will have to attend an Orientation morning, complete an Application form which complies with Health and Safety Regulations as you will be working with animals. You will be subject to Garda Vetting as you may be in contact with children.

The Application form requires your full name, address, phone numbers, e-mail address, date of birth, gender, volunteering areas and medical details.





It also requires an emergency contact with details such as name, phone number, relationship and specific instructions. Please ensure this contact understands why their information is required, their obligations and they agree their information be given to the DSPCA.

These details are held on the Volgistics Database System which will be used to process your application and to schedule your volunteering hours. This system will be fully discussed during your Orientation morning.

You will then be sent a confirmation e-mail by Volgistics, on behalf of the DSPCA and asked to visit the DSPCA campus to sign the registration document, pay the Garda vetting fee and provide suitable proof of ID as outlined on our website. Garda regulations require the DSPCA to retain these documents on file.

Your Details are then sent for Garda vetting and when approved you will be advised by e-mail from Volgistics, on behalf of the DSPCA. You will also be given the procedure to log into the Volgistics system to arrange the schedule or days that suit you.

The DSPCA and Volgistics will retain this information on their databases.

### 3.A.8 – Website User: School Work Experience

Details of the DSPCA School Work Experience program are found under the volunteering section of the website. The website also contains details and information regarding dates and the work experience program. Please note you must be a Junior Member of the DSPCA, see 3.A.4 above.

The booking system is administered through Eventbrite and you will complete the application on line. The details required are your name, address, e-mail address, phone numbers, gender, medical details, school name, school address, teachers name, teacher's phone number, parent/guardian name, parent/guardian phone number, parent/guardian e-mail address and an emergency contact number. Please ensure your parent/guardian has given permission for you to attend this programme.

On successful completion of this program you may also be invited for a Summer Internship to further your experience.



### 3.A.9 – Website User: Make A Will

The DSPCA offers a free Online Will Service in conjunction with Cosgrove Gaynard Solicitors. There is an online questionnaire to be completed which is submitted to the solicitors. The DSPCA has no access to, or hold any of the information input to the questionnaire.

### 3.A.10 – Website User: Dog Training

The DSPCA offers various Dog Training Classes through the website. Information is given about each and if you wish to attend you complete the online form. This application contains your name, address, E-mail address and contact number. Your dog's name, age, breed and behaviour details are also required. Finally, your Bank Card details to process the donation. These details are submitted to Eventbrite to process the booking and donation. You will receive confirmation. Eventbrite will not keep your bank card details but with the DSPCA retain the other details you submitted. The Dog Trainer giving the class will have access of your details.

## 3.B – Visitors to the DSPCA Campus, Events, Activities or Services: CCTV

Please note that CCTV is in operation around the DSPCA campus. Events, Activities or Services provided off campus may be subject to local CCTV surveillance.

This is used not only for Crime Prevention, Insurance and Legal purposes but also to monitor and help keep attendees, staff, animals and property safe.

### 3.B.1 – Donors

You may decide to become a monthly donor, supporting the DSPCA. The information which we request to register you as a donor is the same regardless of whether you sign up via our website (as outlined in the previous section, section 3.A.1) or in person. We will always collect information such as your name, your address, phone number, Bank Account or Card details, and your e-mail address to ensure that we have sufficient information to complete the financial transaction and to communicate appropriately with you if required about this donation.



Should you wish to make a one off donation you may be asked for your name and address to enable us to give you a personal receipt and/or collect the Tax Back on your donation. Your details are not obligatory. This data will be held on our database.

If you choose to pay by Bank Card the transaction will be processed through AIB Merchant Services and Direct Debits will be collected through Allied Irish Bank.

### 3.B.2 – Shopping

You are very welcome to visit the DSPCA Campus where there are several shops selling a range of products. If you choose to pay by Bank Card the transaction will be processed through AIB Merchant Services. The DSPCA will not hold any personal data or any details regarding your Bank Card.

If you wish to join our Grub Club we will require the same details as 3.A.2.

### 3.B.3 – Sponsor A Pet

The DSPCA offers an opportunity to sponsor a pet, for a year, from the shop in the Rehoming part of the campus. When you choose the pet or pets you wish to sponsor you will be required to give your name, address, phone number and e-mail. There is an opportunity to give this as a present, in that case we will need the name of the recipient. If you choose to pay by Bank Card the transaction will be processed through AIB Merchant Services. The DSPCA will hold the personal data but not any details regarding your Bank Card.

### 3.B.4 – Junior Member

The DSPCA offers Junior Membership. This can be organised through the shop in the rehoming area of the campus. You will be required to give the name of the Junior Member, their e-mail, date of birth, address, parents e-mail, and phone number. Children, please make sure you have the consent from your parent/guardian.

If you choose to pay by Bank Card the transaction will be processed through AIB Merchant Services. The DSPCA will hold the personal data but not any details regarding your Bank Card.



### 3.B.5 – Pet Boarding and Doggie Day Care

The DSPCA offers both Overnight Accommodation for your pet and Doggie Day Care. This takes place in the Boarding and Day Care area on the campus and you are welcome to visit these facilities and discuss your needs with our highly trained and caring staff. This is not a charitable institution but offers competitive market rates for their services. All profits are used to fund the charitable work of the DSPCA.

When you visit you may be asked if you wish to receive their newsletter. If you agree to do so you will be asked for your name, e-mail and type of pet.

Further if you wish to start the booking procedure for Pet Boarding or Doggie Day Care you will be given two forms to complete. You will be asked to give your name, address, phone numbers, and e-mail. You are also asked for the following details about your pet, their name, secondary owner if any, type of animal, their date of birth, age, sex, breed, colour, neutered, previously boarded, health history, habits, type of food and treats.

Also you are asked for the name address and phone number of the Veterinary Practice where your pet is registered. Finally, you will be required to give two emergency contact's names, and phone numbers. Please make sure these people understand why their information is required, their obligations and agree to their information be given to the DSPCA.

If you choose to pay by Bank Card for goods or services, the transaction will be processed through AIB Merchant Services. The DSPCA will hold the personal data but not any details regarding your Bank Card.

### 3.B.6 – Attendees at Events and Activities

If you attend our events or activities, you will most likely have completed a registration form either on-line (see 3.A.6. above) or in person. We will always strive to collect the minimum information required from you to ensure that we can efficiently and safely operate the event itself. Typical examples of such information may be your name, your address, your e-mail address and your telephone number. Of course there may be activities or events for which we will require some additional information, in which case we will make sure that we inform you why any such information may be required.



If you choose to pay by Bank Card for any Activities, Events, goods or services the transaction will be processed through AIB Merchant Services. The DSPCA will hold the personal data but not any details regarding your Bank Card.

### 3.B.7 – Volunteering

The DSPCA is more than happy to use the services of Volunteers in various areas of our operations. When visiting the campus, you will be required to complete an Application/Registration form. Please see Section 3.A.7 for processing your application.

If you choose to pay by Bank Card the transaction will be processed through AIB Merchant Services. The DSPCA will not hold any details regarding your Bank Card.

### 3.B.8 – School Work Experience

All visitors who wish to apply will be directed to the website, see 3.A.8 above.

### 3.B.9 – Make A Will

All visitors who wish to use this service will be directed to the website, see 3.A.9 above.

### 3.B.10 – Dog Training

The DSPCA offers various Dog Training Classes. Information is given about each class from our Dog Training Manager in the Boarding area of the campus. If you wish to attend a class, you are required to complete a form. This application contains your name, address, E-mail address and contact number. Your dog's name, age, breed and behaviour details are also requested. All of these details are submitted to Eventbrite to process the booking.

If you choose to pay by Bank Card the donation will be processed through AIB Merchant Services. The Eventbrite System and the DSPCA will hold the personal data but not any details regarding your Bank Card. The Dog Trainer giving the class will have access to these details.



### 3.B.11 – Veterinary Hospital

The DSPCA offers a Veterinary Hospital on site, which provides Veterinary Services for your pet. This is not a charitable institution but offers competitive market rates for their services. All profits are used to fund the charitable work of the DSPCA. You are welcome to visit the Hospital and discuss your requirements with our highly trained and qualified staff.

Should you wish to use these services you will be asked to give your name, address, phone numbers, and e-mail. You are also asked for the following details about your pet, their name, secondary owner if any, type of animal, their date of birth, age, sex, breed, colour, neutered, health history, habits, type of food and treats.

You will also be asked for the name address and phone number of the Veterinary Practice where your pet is currently registered and your consent to request the health records of your pet. Please make sure your previous veterinarian understand why their information is required and agrees to supply the information to the DSPCA.

If you choose to pay by Bank Card for goods or services, the transaction will be processed through AIB Merchant Services. The DSPCA will hold the personal and animal data but not any details regarding your Bank Card.

### 3.B.12 – Adoption

Pet Adoption takes place in the rehoming facility on the campus. You are invited to visit the animals available for adoption. Our Adoption Consultants are on hand to help you through the process.

Before allowing anyone to adopt an animal, we need to ensure that you are able to provide a suitable and secure home. You will be required to complete an Adoption Form. We will ask you for not only your contact information, such as your name, address, e-mail address and phone number, but also for information relating to your occupation, previous pet ownership, home-life and your working schedule. There will also be an opportunity for you to be kept informed about the Organised Events, Activities and Services of the DSPCA.

As the DSPCA will have microchipped your pet you will be required to sign a document to register your ownership with Fido. This document requires your pet's details, your name, address and phone numbers plus there is a



requirement for a Third Party's contact details. This is used in the event of your pet being found and where you are unable to be contacted using the information supplied. Please make sure this contact understand why their information is required and agrees to supply the information to the DSPCA and Fido.

When you have adopted your new pet from the DSPCA you will be given an Adoption Certificate containing your name, address, phone number and e-mail address. The certificate will also include the pet's details, microchip number and when medication or treatment is due.

If the pet qualifies you will be offered 6 week's free cover of Pet Insurance with Allianz. Your contact details and your pet's details will be sent to Alliance in a document signed by you and an Adoption Consultant.

At this stage you will be asked to make a donation and become a monthly supporter. If you agree to a monthly donation your Bank details will be required to set up a direct Debit as per section 3.B.1 above.

If you choose to pay by Bank Card for the Adoption donation, goods or services, the transaction will be processed through AIB Merchant Services. The DSPCA will hold the personal and animal data but not any details regarding your Bank Card.

### 3.B.13 – Fostering

If you wish to join our Fostering Programme you contact us in person at the reception in the rehoming area on the DSPCA campus, by telephone 01 4994720, or by e-mail to [foster@dspca.ie](mailto:foster@dspca.ie). You will be given or sent a DSPCA Fostering Application Form which, requests not only your name, address, phone numbers, e-mail address but also for information relating to your occupation, previous pet experience, home-life and your working schedule. There will also be an opportunity for you to be kept informed about the Organised Events, Activities and Services.

On acceptance you will be requested to sign a DSPCA Foster Care Agreement and each time you foster a pet you will sign a document containing details about you and the pet.



### 3.B.14 – Membership

You may decide to apply for membership of the DSPCA. You will complete a form giving your name, address, date of birth if under 18 and asked to indicate the type of membership you require. Your application is then considered at the next Board meeting and if successful you are required to pay the appropriate fee.

If you choose to pay by Bank Card, it will be processed through AIB Merchant Services. The DSPCA will hold the persona data but not any details regarding your Bank Card.

### 3.B.15 – Mobile Clinic

The DSPCA operates a Mobile Veterinary Clinic where people on Social Welfare can have their pets examined and medicated at a reduced rate. This service is carried out off campus at various locations around the city. Anyone using this service will be required to give their name, address, contact number and pet details. The DSPCA will hold these details on the Mobile Clinic Database only.

### 3.B.16 – Surrender of Animals

If you find a stray dog, you should in the first instance make contact with the dog warden service operated by the local authority in your area.

In the case where you are no longer able to look after your animal you must contact the DSPCA Operations Manager. He will discuss your situation and confirm or otherwise that we have availability. Should a space be available you will be asked to bring the animal to our main reception area. On arrival, you will be asked to complete surrender documentation with the animal's details, your name, address and e-mail address. You will also be asked to provide proof of ownership of your animal. A Surrender donation is usually requested.

If you choose to pay the donation by Bank Card, it will be processed through AIB Merchant Services. The DSPCA will hold your personal data but not any details regarding your Bank Card.





## **4 How long do we retain your information?**

Existing Legislation, other than the General Data Protection Regulations, has priority on retention periods. This mainly covers financial information regarding receipts and payments and data must be kept for a minimum of six years.

The retention period for other information depends on the purpose for which the information was gathered. The next section gives details for each purpose.

Finally, if you wish to be advised of our Events, Activities and Services we will retain your data until you cancel your request to be kept informed.

## **5 Who processes your data?**

Any data which you provide to use will be processed under conditions of absolute confidentiality and we will ensure that we do not share this information with anyone other than a select group of trusted partners. All of our partners have provided guarantees of GDPR compliance, so that we have confidence that your information will be processed with the highest standards of data privacy.

Under no conditions do we transfer any of the data which you provide us outside of the European Economic Area (EEA). If any of our third-party processing partners (as listed in this section) conduct any such transfers, we will ensure that they provide sufficient safeguards as required by GDPR to ensure that your data continues to receive the required levels of data protection.

We use third-party providers to process payments, host our websites and manage events and activities. We only ever use the standard services of the platforms and do not explicitly share any personal data with these third parties. The following section details the third parties we engage with, the type of data we collect, why we collect it and how long the data is retained. Existing legislation may supersede retention periods. Financial information regarding receipts and payments will be retained for the previous 7 years.

For more detailed information regarding the details we collect and why we collect them please refer to the corresponding area in Section 3.



<b>Interaction</b>	<b>Third Party</b>	<b>Data Collected</b>	<b>Why it's collected</b>	<b>Retention</b>
Website visitors	Google Analytics	Anonymised visitor behaviour data	To understand how people behave on the site	26 months
Visitors to the DSPCA Campus	CCTV Harris Security	Video	Crime Prevention, Insurance, Legal and to monitor visitors, staff, animals and property.	Two years or if required for Legal issues
Donations: Once off and monthly	Realex Allied Irish Bank AIB Merchant Services	Billing details, bank and/or bank card details	To process the donation	As long as DSPCA have an account,
Shopping, Sponsor a Pet	Shopify Woofoo Realex AIB Merchant Services	Email, shipping details, card details	To process payments	As long as DSPCA have an account
Junior Membership	Realex, AIB Merchant Services, Constant Contact	Child and parent/guardian details	To process the application and membership donation	For one year after membership expires
Pet Boarding and Doggie Day Care	Realex, AIB Merchant Services	Personal and Pet details	To process bookings	As long as DSPCA have an account
Event registration	Eventbrite Realex	Name, address and contact details.	Manage events, issue tickets	As long as DSPCA

	Constant Contact			have an account
Volunteering	Volgistics Realex, AIB Merchant Services. Garda Vetting	Name, address, personal and contact details.	Process applications and schedule hours	For two years after volunteering ceased.
School Work Experience	Realex, Eventbrite	Personal, medical, school and contact details plus teacher, parent or guardian's name and contact details	Process applications	For two years after work experience ceased.
Free Will Service	Cosgrove Gaynard Solicitors	Details to make your will	To produce your will	Remain with Solicitors until called on.
Dog Training	Realex, AIB Merchant Services Eventbrite Dog Trainer	Personal and Dog's details. Plus Bank Card details	To process the donation and schedule training classes	For two years after work experience ceased.
Veterinary Hospital	Realex, AIB Merchant Services	Personal and Dog's details. Plus Bank Card details	To provide veterinary services for your pet	For two years after you stop using our service.
Adoptions	Realex, AIB Merchant Services	Personal and contact details plus work and lifestyle details	To process the adoption of a pet.	Retained for 20 years.



Fostering	Constant contact	Personal and contact details plus work and lifestyle details	To process the fostering of a pet.	For two years after you stop fostering
Membership	Realex, AIB Merchant Services Constant contact	Personal contact details	To process your membership.	For two years after your last renewal
Mobile Clinic		Personal contact details and Pets medical details.	To provide veterinary services for your pet	Retained for 20 years
Animal Surrender		Personal contact details and surrendered animal's details	To provide veterinary care and rehome the pet	Retained for 20 years

## **6 Security of Your Information**

We take our information security responsibilities very seriously and employ the most appropriate physical and technical measures, including staff training and awareness, to ensure that your information is safe. These measures are regularly reviewed.

### Training

All members of the DSPCA team have received training relating to data security and the processing of personal information. Individuals have been additionally provided with training relating to the processing of data specific to their roles within the DSPCA.

### Physical Security

All of the data provided to the DSPCA in either physical (paper) form or by digital means is stored securely on premise in the DSPCA campus.



## Encryption

All data provided to the DSPCA by digital means are encrypted in transit and also at rest. Encryption at rest is achieved by the use of SSL certificates, while encryption at rest is achieved on multiple levels, using both server level and application level encryption.

## **7 Your Rights**

You have a number of rights in relation to your personal data. We have summarised those rights for you below.

### The Right of Access

You have the right to be informed about which of your data we are currently processing, why we are processing it, and how this processing is taking place. As part of any such request, you may ask us to provide you with a copy of this data.

### Right to Portability

You may wish for your data to be transferred to another data controller of your choice, in which case we will either pass this information to you (as outlined in section 0) or to the controller of your choice.

### Right of Rectification

If you feel that data which we are processing pertaining to you is inaccurate, then please let us know, and we will fulfil your right to have it amended and rectified.

### Right to Erasure

Under many conditions, you will have the right to be completely “forgotten” by the DSPCA. If you make such a request, we will strive to delete all of your data on our system and any correspondences which you have had with us.



### Right to Restrict Processing

You have the right to tell us to stop processing your personal data for any reason. This means that while this request exists, we will still store your data, but won't use it.

### Right to Object

If you feel that we are processing your data in a way which is unlawful, excessive, or if you would simply like us to stop, you have the right to object to this processing.

## **8 Complaints**

If you have any complaints about any data processing activity which we are conducting relating to you or any information which you have supplied to us, please contact us and let us know ([dataprotection@dspca.ie](mailto:dataprotection@dspca.ie)). We will do everything in our power to resolve the situation. In addition, your request will be addressed in line with the GDPR regulations, here is their website ([www.gdprandyou.ie](http://www.gdprandyou.ie)). You always reserve the right of course to make an official complaint to the Data Protection Commissioner's Office.

## **9 Changes to our privacy policy**

We keep our privacy statement under regular review and we will place any updates on this web page. The privacy statement was last updated on 28<sup>th</sup> May 2018.

