

# Privacy Notice for Wish Applications

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Policy Notice last revised February 2021

## **Introduction**

Thank you for taking the time to read our Privacy Notice for Wish applications/referrals.

If you are a parent / legal guardian of one or more Wish Children, please read through this notice.

Should you have any questions or queries please contact us as directed throughout the Notice.

Should you decide not to consent, please be aware this will affect our ability to proceed with granting your child's wish and therefore please contact us as soon as possible to discuss this further by emailing [DPO@makeawish.ie](mailto:DPO@makeawish.ie).

## **Privacy Notice for Wish Applications / Referrals**

We, Make-A-Wish Ireland, are committed to protecting your privacy. This Privacy Notice explains how and why we collect and process your personal information, and with whom we may share it.

Please read this Notice carefully. If you do not accept to this Notice, please do not submit any personal information to us (whether online or within any application/referral forms).

For the purposes of the law and regulations relating to data privacy, in particular the General Data Protection Regulation (GDPR), the data controller is Make-A-Wish Foundation, 2 Leopardstown Business Centre, Ballyogan Avenue, Leopardstown, Dublin 18, Ireland. Charity Registration No. CRA20052256/CHY15267.

## **Does this Notice apply to you?**

This Notice applies specifically to parents or legal guardians who are making applications to us (referred to as "referrals") for or on behalf of their child (referred to as the "wish child"). This Notice also applies to the wish child him or herself and any members of the same family participating in the wish who are minor.

Please note that referrals cannot be made or progressed without the involvement and consent of the parents or guardians of the wish child.

## **For a Parent or Legal Guardian of a Wish Child**

If you are a parent or legal guardian of a wish child, this Notice applies both to your own personal information and that of your wish child. It may also apply to personal information relating to minor children of your family participating in the wish. We therefore request you to consent, on your own behalf and on behalf of your wish child, and if relevant, of your other children of minor age, to our processing of your information as set out in this Notice. If your wish child is at least **16** years old and able to understand the meaning and impact of this Notice, then we will also obtain his or her own consent where possible.

## **For a Wish Child**

If you are the wish child and at least 16 years old, then in addition to obtaining the consent of your parent(s) or legal guardian, we will receive your own consent, provided you understand this Notice and understand the meaning and impact of giving us your consent. In the remainder of this Notice, any reference to “you” and “your” means the parent or legal guardian of a wish child.

## **What information do we collect & process?**

We may collect the following personal information:

- name, postal address, telephone number, email address of parents/legal guardian and/or the wish child,
- the wish child’s gender, date of birth, nationality, language(s) spoken, school
- photographs and/or moving film images of parents/guardian and/or the wish child,
- other personal information relating to the wish child and his or her family, including details of family living arrangements, siblings and pets,
- information relating to the wish him or herself, and other information needed by us to help us in organizing and delivering a wish for the wish child, or for answering any enquiries and requests, and
- where we need to transfer funds for the purpose of organizing the wish, your bank or credit card details.

Where necessary, the above information may be collected for other children of the same family participating in the wish.

We may also collect and process the following sensitive personal information:

- details of the wish child's physical and/or mental health conditions, where needed to assess the wish child's eligibility, needs and requirements (including but not limited to health records and information, details of current medication, diagnosis and treatment, equipment requirements, and mobility and/or disability requirements),
- the wish child's doctor and hospital details, and (where applicable) other related health professionals, such as nurses and social workers, and
- We also capture getting to know you information hobbies, interests in the Wish Booklet

Subject to receiving your consent to the wish child's medical information being released, we may also collect health records and information relating to the wish child directly from the wish child's doctor or other related health professionals. We will combine, store and use this information together with information that you have given to us directly.

In addition to collecting information from wish referral forms, we may also collect personal information during visits or other meetings with you and/or your wish child, or via telephone conversations or emails with or from you and/or your wish child.

### **What do we use the information for?**

We collect, store, use and process personal information primarily to assist us in responding to, processing and fulfilling your or your child's wish application and for providing related services to you and the wish child. This includes:

- processing and responding to applications, queries or requests,
- fulfilling wishes on behalf of the wish child and liaising with medical professionals and/or careers in respect of such activities, and
- where necessary, arranging for medical care and/or treatment for the wish child
- communications related to Make-A-Wish

More generally, we may also use your personal information for the following reasons:

- compliance with legal, regulatory and corporate governance obligations and good practice,
- gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests,
- ensuring business policies are adhered to (such as policies covering security and internet use),

- internal operational reasons, such as troubleshooting, testing, training and quality control,
- ensuring the confidentiality of sensitive information,
- statistical analysis and research, including for the purpose of research on the impact of our programme
- preventing unauthorized access and modifications to systems

We regularly review our data retention periods for all personal information that we hold. We shall endeavor to contact you on a regular basis to ensure that the personal information we hold about you and your wish child is accurate and up-to-date.

### **With whom do we share your information?**

We may share your personal information and that of your wish child with the organisations or types of organisations listed below. The information we share may include the wish child's sensitive information, such as health records, medical condition and requirements.

- Any sponsors directly helping to grant your child's wish
- Make-A-Wish International, a United States entity, in its role as principal licensor of the Make-A-Wish trademark, and provider of administrative and technical support to us, or as a liaison, in connection with any of the IT service providers mentioned below;
- any Make-A-Wish entity located in any other country, where the wish is taking place in that other country or where we need to liaise with that entity to assist us in delivering the wish. That Make-A-Wish entity will only have access to the information it needs in order to provide us with that assistance. Details of where our affiliates are based can be found at <https://www.worldwish.org/en/make-a-wish-story>; for Make-A-Wish America chapters in the United States of America, at <https://wish.org/local-chapters>
- the trusted operators of secure cloud-based platforms accessed by us and/or our Make-A-Wish affiliates (including Make-A-Wish International) from time to time in order to provide centralized data storage, and data management and transaction processing services. Specifically, this includes Salesforce Inc., an entity established in the United States, which hosts a customer relationship management platform used by Make-A-Wish affiliates to enable them to

administer, coordinate and track wish applications. Such operators or service providers shall only be permitted access to your information to the extent required by them in order to provide us with contracted system maintenance, support or related services, or to provide (or assist us in performing) any related data back-up, restoration or other error correction or bug fixing activities.

We also reserve the right to disclose some or all of your or your wish child's personal information to:

- government bodies or law enforcement agencies, or response to other legal or regulatory requests, but only if and to the extent required by law to do so; and
- our auditors, Make-A-Wish International, lawyers or other professional advisers for any auditing, accounting or related business purposes, or in the enforcement, defense or settlement of any legal proceedings brought by or against us, but only if and to the extent such disclosure is strictly necessary for these purposes.

## **Where do we store and process your data?**

The information that we collect relating to you and your wish child will be stored on our secure servers within the Republic of Ireland.

In addition, you and your wish child's personal information may also be transferred by us to, and stored by, entities located outside the European Economic Area, including entities located in the United States of America or to other countries around the world which do not have data protection laws equivalent to those in this country. This information may include sensitive personal data. These entities may include Salesforce Inc. (and its relevant subsidiaries), Make-A-Wish Foundation International, and other Make-A-Wish entities (as mentioned above). We shall ensure that all information transferred to any entity outside the European Economic Area is transferred in compliance with all applicable data protection laws and regulations.

We believe that we have taken all technical and organizational steps reasonably necessary to ensure that your, and your wish child's, and where relevant, your other children's personal information under our control is held securely and in accordance with applicable law and this Notice. However please note that the transmission of information via the internet is not completely secure. Although we will do our best to protect your and your wish child's and where relevant, your other children's personal information, we cannot guarantee the security of any information which is transmitted to us via the internet.

## **Recording and Photography**

We may collect and process photographs and/or moving film images in connection with the fulfilment of any wish application. In addition, where explicit consent has been provided under our Parents Form, we may photograph and/or film wishes for the purpose of sharing stories on behalf of wish children and encouraging charitable activities.

If you have concerns about the use of photographs or moving film images of your wish child, please contact us at +353(0)12052007 or email [dpo@makeawish.ie](mailto:dpo@makeawish.ie).

## **Use of your information for Direct Marketing purposes**

Where you have consented to receive marketing communications from us, and/or to be placed on mailing lists, in connection with future support of our charitable aims or as a potential donor, volunteer or fundraiser, we may also (in accordance with applicable law) use your contact details, including email address and telephone number(s), for requesting and/or processing donations, recording transactions and related direct marketing purposes.

We may also obtain and store your bank or credit card details where you are an active donor or fundraiser and use that information in connection with receiving donations and recording transactions from or with you.

We do not sell or share any of your or your wish child's personal information to any other person or business for the purposes of marketing.

Even if you have initially consented to receive marketing communications from us, you have the right at any time to ask us not to use your personal information for marketing purposes. You may exercise this right by opting out of any marketing communications we may send you. You may also exercise this right by contacting us at +353(0)12052007 or by writing to us at Make-A-Wish Ireland, 2 Leopardstown Business Centre, Ballyogan Avenue, Leopardstown, Dublin 18, Ireland.

## **Your Rights**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions.
- The right to access the personal data we hold about you.

- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold.
- The right to restrict (i.e. prevent) the processing of your personal data.
- The right to object to us using your personal data for a particular purpose or purposes.
- The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

You or your wish child are entitled to access any personal information we hold about you or your wish child, respectively. You or your wish child may contact us at any time to request a copy of your information or to have any inaccuracies corrected. Please contact us at +353(0)12052007 or by writing to us at Make-A-Wish Ireland, 2 Leopardstown Business Centre, Ballyogan Avenue, Leopardstown, Dublin 18, Ireland if you would like to correct, update or request a copy of any personal information that we hold relating to you or your wish child, or if you have any questions in relation to our use of that information under this Notice.

Further information about your rights can also be obtained from the Data Protection Commission.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Data Protection Commission.

### **Contacting Us**

You may contact us in relation to this Notice at +353(0)12052007 or by writing to Make-A-Wish Ireland, 2 Leopardstown Business Centre, Ballyogan Avenue, Leopardstown, Dublin 18, Ireland.