

# Privacy statement

**We, A Lust for Life, a company limited by guarantee, registered in Ireland (Company Number 21993) which has been granted Charitable Status (registered revenue number CHY 21993 and Registered Charity Number 20157913), are committed to protecting and respecting your privacy.**

This Privacy Statement tells you about your privacy rights and sets out how we, as a Data Controller, collect, use, process and disclose your personal data relating to your interactions with our website - [www.alustforlife.com](http://www.alustforlife.com) (the **Site**). This Privacy Statement should be read in conjunction with our **Cookie Policy** set out below.

Please read the following carefully to understand our use of your personal data.

## Information we may collect from you

"Personal data" under Data Protection Law (including the EU General Data Protection Regulation 2016/679 (**GDPR**), the EU Privacy and Electronic Communications Directive 2002/58/EC, and all national implementing legislation) means any information about an individual from which that person can be identified. You can use our Site without being required to provide any personal data to us. We only collect personal data about you on the Site which you volunteer when you email us, by using our online forms, in order to deliver a service or product to you, or to send you newsletters or other information. In providing our services, we may receive personal data indirectly. Categories of such personal data include: names, addresses, contact information and other information which is relevant to the provision of our services.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## How we use personal data we collect

We will only use your personal data for the purposes and legal bases set out in the table below.

Purpose(s) for Processing	Legal Basis for Processing
<i>To manage our relationship with you, including processing your order and delivering the requested product or service to you</i>	<ul style="list-style-type: none"><li><i>The processing is necessary to perform our contract with you and to comply with our legal obligations, including tax and accounting rules</i></li></ul>
<i>For the prevention and detection of fraud, money laundering or other crimes</i>	<ul style="list-style-type: none"><li><i>The processing is necessary for us to comply with legal and regulatory obligations</i></li></ul>

<p><i>Sending newsletters, A Lust For Life Book Club or other direct marketing electronic communications</i></p>	<ul style="list-style-type: none"> <li>● <i>The processing is necessary to perform our contract with you to the extent you have subscribed to such newsletters,</i></li> <li>● <i>You have provided your consent to receipt of direct marketing communications – which can withdraw at any time</i></li> <li>● <i>It is in our legitimate business interests to send customers information about similar products or services - you have the right to object to such communications at any time</i></li> </ul>
<p><i>To manage our recruitment process</i></p>	<ul style="list-style-type: none"> <li>● <i>The processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</i></li> </ul>
<p><i>To manage events</i></p>	<ul style="list-style-type: none"> <li>● <i>The processing is necessary to perform our contract with you and to comply with our legal obligations, including tax and accounting rules</i></li> </ul>
<p><i>For publication of articles</i></p>	<ul style="list-style-type: none"> <li>● <i>The processing is necessary for us to comply with legal and regulatory obligations</i></li> </ul>
<p><i>To customise your experience on the Site, or to serve you specific content that is relevant to you</i></p>	<ul style="list-style-type: none"> <li>● <i>The processing is necessary to support our legitimate interests in managing our business (to define types of customers for our products and services, to keep our Site updated and relevant, to develop our business and to inform our marketing strategy) provided such interests are not overridden by your interests and rights</i></li> </ul>

We will store your personal data only for as long as necessary for the purposes of providing access to our Site and related services to you; as required by law, and for the exercise or defence of legal claims.

## **Online Shop**

**We collect and process the following information when you place an order:** name, address, phone number, email address, payment details and transaction id

**We store the following information when you place an order:** name, address, phone number, email address, payment details and transaction id

We retain your personal data for 7 years and this is shared with our data processors to complete order creation, payment and shipping.

## **Job Application**

**We collect the following information when you apply for a job:** name, address, phone number, email address, qualifications, employment history, ethnicity, gender.

**We process and store the following information when you apply for a job:** name, address phone number, email address, qualifications, employment history.

We retain personal data for 1 year for unsuccessful candidates.

## Events

**We collect, process and store the following information when you take part in an event:** name, email address, payment details and transaction id.

We retain your personal data for 7 years and this is shared with our data processors to complete order creation, payment and event management.

## Donations

**We collect, process and store the following information when you make a donation:** name, address, username, email address, transaction id and transaction type.

We retain your personal data for so long as your donation account remains active.

## Fundraising

**We collect, process and store the following information when seeking fundraising opportunities:** name, email address, phone number and organization name

We retain your personal data for 7 years and this is shared with our data processors for fundraising management and tasks.

## Article Publication

**We collect, process and store the following information when publishing an article:** name, email address, bio and photo

We retain your personal data for the lifetime of the article, plus 6 months from deletion.

## Book Club

**We collect, process and store the following information when you sign up to a newsletter:** name, address and email address.

We retain your personal data until you unsubscribe from our book club.

## Newsletters

**We collect, process and store the following information when you sign up to a newsletter:** name, address and email address.

If you do not provide the requested information, we will not be able to deliver our services or products to you or respond to you.

We retain your personal data until you unsubscribe from our mailing list.

## Gone Past Talking

**We collect, process and store the following information when you take part in our GPT programme:** name, age, education status, gender, ethnicity, email, phone number, location, service that you're accessing the programme through e.g., school or other

We retain your personal data for 7 years and this is shared with our data processors to facilitate the workshops, to facilitate the mentoring programme and to complete the evaluation.

## Disclosure of your information

We may disclose your personal data to third parties who provide a service to us, including our Internet Service Provider who records data on our behalf and is bound by confidentiality provisions, or in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets or if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or where necessary for our legitimate business interests to protect the rights, property, or safety of A Lust For Life, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## Links to other sites

Our Site may, from time to time, contain links to and from other websites. If you follow a link to any of those websites, please note that those websites have their own privacy policies and we do not accept any responsibility or liability for those policies. Please check those policies before you submit any personal data to those websites.

## Your rights

You have the right to request access to, rectification, or erasure of your personal data, or restriction of processing or object to processing of your personal data, as well as the right to data portability. The following is a summary of your rights:

- **The right of access** enables you to receive a copy of your personal data.
- **The right to rectification** enables you to correct any inaccurate or incomplete personal data we hold about you.
- **The right to erasure** enables you to ask us to delete your personal data in certain circumstances, including where:
  - It is no longer necessary for us to process your personal data;
  - You consider the personal data is being unlawfully processed;
  - You withdraw your consent (where the processing is based on consent);
  - You object to the processing and there are no overriding legitimate grounds justifying the processing; or
  - The personal data has to be erased to comply with a legal obligation. We may refuse your request if the processing is necessary to comply with a legal obligation or for the establishment, exercise or defence of legal claims.
- **The right to restrict processing** enables you to ask us to halt the processing of your personal data in certain circumstances, including where:
  - You contest the accuracy of your personal data;
  - You consider the processing is unlawful, but you do not want your personal data erased;

- We no longer need the personal data but you require it for the establishment, exercise or defence of legal claims; or
- You have objected to the processing, and verification as to our overriding legitimate interests is pending.

We may continue to process your personal data:

- Where we have your consent to do so;
  - For the establishment, exercise or defence of legal claims;
  - The processing is necessary to protect the rights of other individuals or legal persons; or
  - For important public interest reasons.
- **The right to object** enables you to object to us processing your personal data on the basis of our legitimate interests (or those of a third party). We will stop such processing unless we can demonstrate compelling legitimate grounds for the processing which override your interests or the processing is necessary for the establishment, exercise or defence of legal claims. You also have the right to object to us processing your personal data for direct marketing purposes.
  - **The right to data portability** enables you to request us to transmit personal data that you have provided to us, to a third party without hindrance, or to give you a copy of it so that you can transmit it to a third party, where technically feasible. The right only applies where:
    - The processing is carried out by automated means; and
    - The processing is based on your consent or for the performance of a contract with you.

You have the right to lodge a complaint with the Data Protection Authority, in particular in the Member State of your residence, place of work or place of an alleged infringement, if you consider that the processing of your personal data infringes the GDPR.

If you wish to exercise any of these rights, please contact us (see Contact Us below). We will respond to your request within one month. That period may be extended by two further months where necessary, taking into account the complexity and number of requests. We will inform you of any such extension within one month of receipt of your request. We may request proof of identification to verify your request. We have the right to refuse your request for the reasons set out above, or if it is manifestly unfounded or excessive, or to the extent necessary for important objectives of public interest.

## **Security and where we store your personal data**

We are committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorised access and

use. As effective as modern security practices are, no physical or electronic security system is entirely secure. We cannot guarantee the complete security of our database, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. We have implemented strict internal guidelines to ensure that your privacy is safeguarded at every level of our organisation. We will continue to revise policies and implement additional security features as new technologies become available.

All information you provide to us is stored on secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our Site. Any transmission of personal data is at your own risk. Once we receive your personal data, we use appropriate security measures to seek to prevent unauthorised access or disclosure.

## Cookie Policy

This Cookie policy helps to explain the occasions when and why cookies may be sent to visitors to the Site. "Cookies" are text-only pieces of information that a website transfers to an individual's hard drive or other website-browsing equipment for record-keeping purposes. Cookies allow the Site to remember important information that will make your use of the site more convenient. A cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie, and a randomly generated unique number or other value. Certain cookies will be used on the Site regardless of whether you are logged in to your account or not.

Session Cookies are temporary cookies that remain in the cookie file of your browser until you leave the Site.

Persistent Cookies remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie). When we use session cookies to track the total number of visitors to our Site, this is done on an anonymous aggregate basis (as cookies do not in themselves carry any personal data). We may also employ cookies so that we remember your computer when it is used to return to the Site to help customize your web experience. We may associate personal information with a cookie file in those instances.

### How we use cookies

Like most websites, we use cookies for a variety of purposes in order to improve your online experience, for analytics and for security, but specifically we use Cookies on the Site for the following purposes:

**Your Preferences & User Experience:** We use cookies to gather certain information about users, such as browser type, server, language preference, and country setting, in order to store user preferences on our Site to make your user experience more consistent and convenient.

**Security:** We use cookies to limit certain types of cyber attacks.

**Analytical:** We use cookies to analyse user activity in order to improve the Site. For example, we can use cookies to look at the number of articles viewed or loading times for pages. We can use such analysis to gain insights about how to improve the functionality and user experience of the Site.

## Changes to this Privacy Statement

We reserve the right to change this Privacy Statement from time to time at our sole discretion. If we make any changes, we will post those changes here and update the "Last Updated" date at

the bottom of this Privacy Statement. However, if we make material changes to this Privacy Statement, we will notify you by means of a prominent notice on the Site prior to the change becoming effective. Please review this Privacy Statement periodically for updates.

## **Contact Us**

Questions, comments, requests and complaints regarding this Privacy Statement and the personal data we hold are welcome and should be addressed to **data@alustforlife.com** or sent in writing to **Chair of the Board, A Lust for Life, Arachova, 16 Newgrove Avenue, Dublin, D04 KW32, Ireland**. All requests will be dealt with promptly and efficiently.

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