



www.migrant-advocacy.ie

Privacy Statement

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1. Overview

Migrant Advocacy Service (MAS) has developed this Privacy Statement to explain how we may collect, retain, process, share and transfer your Personal Data when you visit our Sites and/or use our Services in the Consultation office space and/or via email and/or

phone consultation and/or Zoom online platform and/or others online platforms. This Privacy Statement applies to your Personal Data when you visit Sites or use Services and does not apply to online websites or services that we do not own or control.

This Privacy Statement is designed to help you obtain information about our privacy practices and to help you understand your privacy choices when you use our Sites and Services. This Privacy Statement may be supplemented with additional notices.

We have defined some terms that we use throughout the Privacy Statement. You can find the meaning of a capitalised term in the **Definitions** section.

Please contact us at info@migrant-advocacy.ie if you have questions about our privacy practices not addressed in this Privacy Statement.

2. What Personal Data Do We Collect?

We collect Personal Data about you when you visit our Website or use our Services, including the following:

- **Personal data that you choose to provide us to obtain our Services and/or receive information and support from our consultants**– If you submit a query via the MAS website contact form, you would be requested to provide your name, your mobile number, your email address and your comments or type of query you have. The information is required to understand and assess your question and respond accurately with the best information available. Any personal information you attach or submit in the comments box is not mandatory, but by doing so, you are providing your consent for our consultants to review and process it.
- **Other information we collect related to your use of our Website or Services**
 - We may collect additional information from or about you when you communicate with us, contact our office by phone or email or respond to social media messages. The additional information might be questioned to better understand and assess your query and to provide you with the best response and information available. Any personal information you disclose by phone and/or attach and/ or submit in the email is not mandatory, but by doing so, you are providing your consent for our consultants to review and process your query.

Migrant Advocacy Service collects personal data for consultations, advocacy casework and representation of clients before the Social Welfare Appeals Office and other government agencies.

To perform our obligations, duties and instructions given by our clients and for the provision of the best information and advocacy service, we are collecting and processing various types of personal data.

While the type of personal data may change occasionally, it is important that you are aware of the types of personal data we gather and use. The following list provides an indication of the categories and types of personal data we might use to perform our operational duties and activities.

- full name
 - date of birth
 - citizenship/nationality
 - address
 - contact number
 - email address
 - employment details (if applicable)
 - family details (if applicable)
 - immigration details (if applicable)
 - transaction payment details
-
- query summary

The information we collect depends on the nature of the query and the type of assistance you, as our client, require. You, our client, might provide additional documents during consultation and casework, which is pertinent to assessing the issue. This information is always provided voluntarily by our client.

3. Why Do We Retain Personal Data?

We retain Personal Data in an identifiable format for the least amount of time necessary to fulfil our legal or regulatory obligations and for our operational purposes, that is, three years. We may retain Personal Data for longer if it is in our legitimate business interests (for example, your case is ongoing and not closed). If your case is closed and all service fees

are paid, we will take steps to delete and /or anonymise your Personal Data. We will continue to use and disclose such Personal data in accordance with this Privacy Statement.

4. How Do We Process Personal Data?

We may process your Personal Data for various reasons justified under data protection laws in Ireland and the European Union.

- **To operate and provide the Services to you.** Please see the following documents for additional information.
- **To manage our operational needs**, such as monitoring, analysing, and improving the Services. For example, we analyse service user queries and research how you use our Services.
- **To comply with our obligations and enforce the terms of our Services**, including all applicable laws and regulations.
- **For our legitimate interests, including:**
 - **enforce** the terms of our Services;
 - **manage our everyday operational needs**, such as monitoring, analysing, and reporting;
 - **anonymise Personal data** to provide aggregated statistical data to third parties, including our partners and public members, about how, when, and why clients visit our Office and use our Services; and
 - **provide personalised Services (Newsletter and Email updates).** We may use your Personal Data and other information collected in accordance with this Privacy Statement to provide targeted information in the form of email updates and newsletters.
- **With your consent:**
 - To send you updates about MAS Services developments. We may also Process your Personal Data to tailor the content to match your interests.
 - To respond to your requests, for example, to contact you about a question you submitted to our consultants.

You can withdraw your consent at any time and free of charge. Please refer to the “Your Privacy Choices” section for more information on how to do that.

5. Do We Share Personal Data?

We may share your Personal Data or other information about you with others in various ways as described in this section of the Privacy Statement and the 'Third-party processor list' supplementary document. Here are the potential third parties we might share information with and the reasons.

Third-party	Description
Any legal successors to the Migrant Advocacy Service	Where the Migrant Advocacy Service transfers its business to another organisation or merges with another organisation.
Migrant Advocacy Service Partners, Pro Bono partners and Sub-Contractors	In conducting statistical and case analyses for reporting, training and social policy. In the investigation of a complaint in accordance with our complaints procedures. To provide quality or case reviews. To deliver casework.
ICT providers	Where ICT services such as hardware, software, network facilities, case management systems, telephone systems or similar are provided by or maintained by a third party.
Archiving companies	Where we archive our files in facilities provided by a third party.
Funders (e.g. Louth Local Development CLG)	Where we are successful grant applicants, we are obliged to share statistical data and reports with our funders or Enterprise Office(s). No personal data that identifies the person is shared, only anonymous data. For more information regarding the data collected and shared for reporting purposes, please see the "What Personal Data Do We Collect" document section.

Depending on your circumstances and with your authorisation, we may also share your data with other third parties.

Third-party	Description
Private organisations	We engage with a private organisation on your behalf, for example, with a service provider.
Public bodies	We refer you to a public body or assist you in accessing the services of a public body, for example, the Social Welfare Appeals Office.
Voluntary organisations	We refer you to a voluntary organisation or assist you in accessing the services of a voluntary organisation, for example, the Free Legal Advice Centres (FLAC).
NGOs (Non-governmental Organisations)	We refer you to other NGOs or assist you in accessing the services of some NGOs, for example, the Irish Refugee Council; Immigrant Council of Ireland; Crosscare; Focus Ireland and others.
Government departments /agencies	We engage with a government agency or department on your behalf, for example, with a Department of Justice and/or Department of the Social Protection and/or An Garda Síochána.
Law of Courts/ Tribunals/ Workplace Relations Commission	We engage with courts and/or the Workplace Relations Commission (WRC) on your behalf as your advocate.

Suppose you are a job applicant or sub-contractor, or partner with MAS. In that case, we might also share the information with the following:

Third-party	Description
Recruitment companies	Where we use a third party to assist in recruitment competitions.
Interview panel members	We interview you, and a panel member is an external person.
External organisations nominated by you	Where you provide referees to contact in relation to your application.

HR support companies or other legal advisers	Where we require advice with regard to an aspect of your application or the recruitment process, or employment advice
Insurance companies	Where we engage with an insurance company in relation to an element of your application.

We also might share information with other third parties not outlined in this list if it is required by law, including:

- if we need to do so to comply with a law, legal process or regulations;
- to law enforcement authorities or other government officials, or other third parties pursuant to a subpoena, a court order or a different legal process or requirement applicable to MAS
- if we believe, in our sole discretion, that the disclosure of Personal Data is necessary or appropriate to prevent physical harm or in connection with an investigation
- to protect the vital interests of a person;
- to protect our property, Services and legal rights;
- to support our audit, compliance, and governance functions.

With your consent:

We also will share your Personal Data and other information with your consent to other third parties.

In addition, MAS may provide anonymised aggregated statistical data to third parties, including our partners, about how, when, and why people visit our Office and use our Services. This data will not personally identify. We do not share your Personal Data with third parties for their marketing purposes without your consent.

6. How Do We Use Cookies?

MAS website, www.migrant-advocacy.ie, uses cookies to improve users' experience while they navigate through the website. Out of these, the cookies that are categorised as necessary are stored on users' browsers as they are essential for the working of basic

functionalities of the website. We also use third-party cookies that help us analyse and understand how users use this website. These cookies will only be stored in the user's browser with user consent. Users also have the option to opt out of these cookies. But opting out of some of these cookies may affect users' browsing experience.

A cookie is a piece of data stored by a website within a browser. Please see the list of Cookies we use on our website.

Cookie Name	Purpose	Duration	Cookie Type
XSRF-TOKEN	Used for security reasons	Session	Essential
hs	Used for security reasons	Session	Essential
svSession	Used in connection with user login	12 months	Essential
SSR-caching	Used to indicate the system from which the site was rendered	1 minute	Essential
_wixCIDX	Used for system monitoring/debugging	3 months	Essential
_wix_browser_sess	Used for system monitoring/debugging	session	Essential
consent-policy	Used for cookie banner parameters	12 months	Essential
smSession	Used to identify logged-in site members	Session	Essential
TS*	Used for security and anti-fraud reasons	Session	Essential
bSession	Used for system effectiveness measurement	30 minutes	Essential
fedops.logger.X	Used for stability/effectiveness measurement	12 months	Essential
wixLanguage	Used on multilingual websites to save user language preference	12 months	Functional
__stripe_mid	Stripe sets this cookie to process payments.	1 year	Essential
__stripe_sid	Stripe sets this cookie to process payments.	30 minutes	Essential
_ga	Google Analytics sets this cookie to calculate visitor, session and campaign data and track site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.	1 year 1 month 4 days	Analytics
_gid	Google Analytics sets this cookie to store information on how visitors use a website while also creating an analytics report of the website's performance. Some of the collected data includes the number of visitors, their source, and the pages they visit anonymously.	1 day	Analytics
_gat_gtag_UA_*	Google Analytics sets this cookie to store a unique user ID.	1 minute	Analytics
ga*	Google Analytics sets this cookie to store and count page views.	1 year 1 month 4 days	Analytics
_fbp	Facebook sets this cookie to display advertisements when either on Facebook or on a digital platform powered by Facebook advertising after visiting the website.	3 months	Analytics
fr	Facebook sets this cookie to show relevant advertisements by tracking user behaviour across the web, on sites with Facebook pixel or Facebook social plugin.	3 months	Advertisement

NID	Google sets the cookie for advertising purposes; to limit the number of times the user sees an ad, to unwanted mute ads, and to measure the effectiveness of ads.	6 months	Advertisement
[SessionID#27]	PayPal provides this cookie. The cookie is used in context with transactions on the website - The cookie is necessary for secure transactions.	3 years	Essential
Necessary	Used in context with the PayPal payment function on the website. The cookie is necessary for making a safe transaction through PayPal.	3 years	Essential

We use Google Analytics to find out how many visitors our site receives, which pages are most popular and which browsers are used most. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>

You can change your cookie preferences at any time. In addition to this, different browsers provide different methods to block and delete cookies used by websites. You can change your browser's settings to block/delete the cookies. Below are the links to the support documents on managing and deleting cookies from major web browsers.

Chrome: <https://support.google.com/accounts/answer/32050>

Safari: <https://support.apple.com/en-in/guide/safari/sfri11471/mac>

Firefox: <https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox?redirectslug=delete-cookies-remove-info-websites-stored&redirectlocale=en-US>

Internet Explorer: <https://support.microsoft.com/en-us/topic/how-to-delete-cookie-files-in-internet-explorer-bca9446f-d873-78de-77ba-d42645fa52fc>

If you use any other web browser, please visit your browser's official support documents.

7. What Privacy Choices Are Available To You?

You have choices regarding the privacy practices and communications described in this Privacy Statement. Many of your options may be explained when you visit our website or use our Service.

- **Choices Relating to the Personal Data We Collect**

- You may decline to provide Personal Data when MAS requests, but certain Services or all Services may be unavailable.
- **Choices Relating to Communication:**
 - **MAS Updates and Newsletter:** We may send you MAS Updates and Newsletter about our Website and Services through various communication channels, for example, email, text and messaging applications. You may opt out of these communications we send by following the instructions in the communications you receive.
 - **Informational and Other:** We will send communications to you that are required or necessary, that contain important information and other communications that you request from us. You may **not** opt out of receiving these communications otherwise, service will be terminated.

8. What Are Your Rights?

Subject to limitations set out in Irish and EU data protection laws, you have certain rights regarding your Personal Data. In particular, you have a right of access, rectification, restriction, opposition, erasure and data portability. If you wish to complete an access request to all personal data that MAS holds on you, please note that photo identity may be required to prove your identity.

You may exercise any of the above rights by filling in a subject access request and emailing it to info@migrant-advocacy.ie.

You may complain to your supervisory authority concerning our processing of your personal data. The supervisory authority in Ireland is the Data Protection Commissioner. The website is www.dataprotection.ie.

9. How Do We Protect Your Personal Data?

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Data against loss, misuse, unauthorised access, disclosure, and alteration. The security measures include firewalls, data encryption, physical access controls to our office, and information access authorisation controls. While we are dedicated to securing our systems and services, you are responsible for verifying that the Personal Data we maintain about you is accurate and current. **We are not responsible for protecting any Personal Data we share with a third party you have authorised.**

10. What Else Should You Know?

Changes to this Privacy Statement.

We may revise this Privacy Statement occasionally to reflect changes to our Website and Services or applicable laws. The revised Privacy Statement will be effective as of the published effective date.

11. Contact Us

You may contact us with general questions or concerns about this Privacy Statement, supplemental notices, or how we handle your Personal Data.

We want to ensure your questions go to the right place:

You may send us a written request via email at info@migrant-advocacy.ie.

If you are unsatisfied with how we address your concerns, you have the right to lodge a complaint with the Supervisory Authority for data protection. The supervisory authority in Ireland is the Data Protection Commissioner. The website is www.dataprotection.ie.

12. Definitions

- **MAS** means Migrant Advocacy Service. In this Privacy Statement, MAS is sometimes referred to as “we,” “us,” or “our,” depending on the context.
- **Personal Data** means information associated with an identified or directly or indirectly identifiable natural person. “Personal Data” can include, but is not limited to, name, postal address (including billing and postal addresses), telephone number, email address, date of birth, and government-issued credentials (e.g., driver’s license number, national ID, passport number).
- **Process** means any method or way that we handle Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data.
- **Services** means any services that MAS provides to its users, such as
 - Online and in-person consultations;

- Advocacy;
 - Representations before the Workplace Relations Commission (WRC) and/or Social Welfare Appeals Office and/or other government agencies
 - Assessment of victims of domestic violence
 - Community Training and Meetings
 - Community Focus Groups and Seminars
- **Site(s)** means the MAS website, official social media platforms, or other online properties through which MAS offers the Services and/or communicates with its service users.
- **User** means someone who uses the Services or accesses our Site and has established a relationship with MAS, our client, partner, or sub-contractor.