



Privacy Notice

1. WHO ARE WE?

We are Saint Joseph's Shankill ("SJS") with an address at Crinken Lane, Shankill, Dublin. We are part of the Saint John of God Hospitaller Services Group, which has its headquarters in Rome.

Saint John of God Hospital CLG is the data controller who determines the purposes and means of the processing of personal data for Saint Joseph's Shankill.

SJS provides person-centred care to our residents with dementia specific needs. Saint John of God Hospital provides mental health services to private and public patients in Ireland, their privacy notice can be read at [St John of God Hospital Privacy notice](#)

This notice sets out the basis on which any personal data we collect from you, or from others, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

For Data Protection related queries, our Data Protection Officer can be contacted by:

Email: DPOHosp@sjog.ie

Post: Data Protection Officer, Saint John of God Hospital, Stillorgan, Co. Dublin, A94 FH92

2. WHAT PERSONAL INFORMATION DO WE COLLECT FROM YOU?

We have set out below, the types of personal and special category data which SJS may collect about you.

"Personal data" means any information relating to you which allows us to identify you, such as, your name, contact details, payment details and information about your use of the Hospital's services. Personal data does not include data where the identity of the individual has been removed, i.e., anonymous data.

"Special category data" refers to more sensitive personal data which requires a higher level of protection, such as data relating to your health, religious beliefs, or political opinions. This sensitive data can only be processed under strict conditions.

Category	Personal Data Processed
Personal Data	
Resident Details	When you become a resident of SJS and throughout your time as a resident, we will collect: <ul style="list-style-type: none">• Name• Address• Contact details• Date of Birth



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	<ul style="list-style-type: none"> • MHIS Number • Gender • Marital status • PPS Number • Photograph • Next of kin contact details/Emergency contacts • Information shared with us during the provision of services which may include third party personal data • Family support service provision • Financial information
Next of Kin/Visitors Details	<p>If you are one of our resident's next of kin or a visitor of SJS, we may collect:</p> <ul style="list-style-type: none"> • Name • Phone Number • Address • Email Address
Referrer Details	<p>Where an individual is referred to our services, we may collect:</p> <ul style="list-style-type: none"> • Name • Contact details • Address/Practice address • Relation to resident • CCTV Footage
Financial Details	<p>Where you are a Resident of the SJS, we may collect:</p> <ul style="list-style-type: none"> • Bank details
Pharmacy Details	Your local pharmacy
Website User Details	<ul style="list-style-type: none"> • IP address • Device type • Browser type
Fundraiser Details	<p>Where you choose to become a donor or fundraiser:</p> <ul style="list-style-type: none"> • Name & Contact details • The event which you may have attended • Payment details
Communications Data	<p>Where you correspond with us by phone, e-mail, via our websites, or social media pages, or otherwise, for feedback, queries, complaints etc. We ask you to disclose only as much information as is necessary to provide you with services or to submit a question/suggestion/comment in relation to our site or our services. When you communicate with us, we may collect:</p> <ul style="list-style-type: none"> • Name & Contact details • Details in relation to your feedback/query/comment/complaint. <p>We may also communicate with you. Where you have opted into receiving information from SJS such as, updates and information about our services, upcoming events and campaigns, educational material, press releases and so on, we will collect:</p>



	<ul style="list-style-type: none"> Name & Contact details
Job Applicants Details	<p>Where you apply for a vacant position at SJS, we will collect:</p> <ul style="list-style-type: none"> Information contained in CVs Name Address & Contact details Employment History Education Application Form details <p><i>We ask that you do not disclose any sensitive information in your application.</i></p>
Supplier Details	<p>Where suppliers provide us with services, we will collect:</p> <ul style="list-style-type: none"> Name Business address & Contact details Billing payment details
Trainees	<p>Where you join us for training, we will collect:</p> <ul style="list-style-type: none"> Name and Contact Details Information volunteered throughout the course
CCTV Data	<p>Where you are a resident, visitor or an employee of SJS we may collect:</p> <ul style="list-style-type: none"> Images and Recordings of you entering/on the premises
Special Categories of Data	
Health & Medical Details	<p>When you become a resident of SJS and throughout your time as a resident, we will collect:</p> <ul style="list-style-type: none"> Clinical and Consultation information Medical information Medication information Information which you inform us of, throughout the course of providing healthcare services
Job Applicants Details	<p>Prior to becoming an employee of SJS, we may collect:</p> <ul style="list-style-type: none"> Garda Vetting Pre-employment Medical Information

3. WHAT INFORMATION ABOUT YOU DO WE OBTAIN FROM OTHERS AND WHERE DO WE GET THIS INFORMATION?

When you use our healthcare services, we may obtain some of the above categories of personal data, such as, reasons for referral, medical history, and medications information, contact details, etc. from others, including:

- Your referring Public Health Nurse or GP
- Your family members and/or next of kin



4. PURPOSES FOR COLLECTION AND OUR LAWFUL BASES FOR PROCESSING

In most cases, we collect information from you for the primary purpose of providing care and treatment to you and for associated administrative processes, for example, arranging payment of services. Your personal data will be processed as part of our contract with you to provide you with these services.

The processing of special category data may also be necessary for reasons of public interest in the area of public health. If the purpose of the processing is for a reason other than the reasons outlined, we will seek explicit consent to process your special category personal data.

Below we have outlined what we do with your personal data, why we do it (the purpose) and our legal basis for processing.

What We Do	Why We Do It	Personal Data Involved	Our Legal Basis
Add you to our waiting list	So that we can offer you or your loved one a place as soon as one becomes available.	<ul style="list-style-type: none"> Resident Details Next of Kin Details Insurance Details Health & Medical Details 	Performance of a Contract
Contact you about Vacancies	So that we can offer you or your loved one a place as soon as one becomes available.	<ul style="list-style-type: none"> Resident Details Next of Kin Details 	Performance of a Contract
Carry out Pre-Admission Assessments	To make sure that we all the necessary skills, knowledge and equipment to support you.	<ul style="list-style-type: none"> Resident Details Next of Kin Details Insurance Details Health & Medical Details 	Performance of a Contract For the provision of Health, Social Care, Treatment and Management of our Services.
Manage and deliver your care	To provide care and treatment to you.	<ul style="list-style-type: none"> Resident Details Health & Medical Details 	Performance of a Contract For the provision of Health, Social Care, Treatment and Management of our Services.



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Share your details with our trusted medical service providers	This is so that you can receive medical, dental and other types of treatments as required during your time here.	<ul style="list-style-type: none"> • Resident Details • Next of Kin Details • Insurance Details • Health & Medical Details 	Performance of a Contract
Share your details with our trusted service providers	This ensures that your environment is set up with the right type of equipment for your specific needs, such as bedding, chairs and that your dietary requirements are looked after.	<ul style="list-style-type: none"> • Resident Details • Health & Medical Details 	Performance of a Contract
Provide training services	We offer different types of training services, we will process your personal data where you apply to one of these courses.	<ul style="list-style-type: none"> • Trainee details 	Performance of a Contract Legitimate Interests
Carry out health research studies	<p>To help develop understanding about health risks and causes to develop new treatments.</p> <p><i>All applications to carry out health research studies must first receive approval from our Research Ethics Committee.</i></p> <p><i>All health research in Ireland is governed by the Health Research Regulations 2018 (HRR) and the amended regulations 2021.</i></p>	Health & Medical Details	Your Explicit Consent or in accordance with the HRR.
Carry out Retrospective Chart Review studies	<p>To help develop understanding about health risks and causes to develop new treatments.</p> <p><i>If your records and data are to be used for a Retrospective Chart Review, your personal data will be protected by being</i></p>	<ul style="list-style-type: none"> • Resident Details • Health & Medical Details 	Our Legitimate Interests Public Interest, Scientific, Historical Research Purposes



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	<p><i>fully anonymised or given a unique code so that your name does not appear alongside the information or in any of the results of the research. Any findings from a study that are published will not identify you. Any such study will be reviewed and approved by a research ethics committee prior to commencement.</i></p> <p><i>Retrospective Chart Reviews are governed by Health Research Regulations 2018 (HRR) and the amended regulations 2021.</i></p>		
Conduct clinical audits	<p>To improve and advance treatment and care and to ensure best practice and for quality assurance and improvement purposes.</p> <p><i>If your records/data are to be used for activities such as clinical audit and quality improvement, all information will be anonymised meaning that it cannot be traced back to any service user.</i></p>	Health & Medical Details	Our Legitimate Interests
Communicate with you as part of our relationship with you or as per our contract with you	<ul style="list-style-type: none"> • To set you up as a supplier on our systems. • To ensure payment of our invoices. • To liaise with you about projects that we are undertaking with you. 	Supplier Details	Performance of a Contract
Process job applications	To determine if you're the right fit for an open role.	Job Applicant Details	Our Legitimate Interests



	<i>We use a third-party service provider to manage our recruitment process.</i>		
CCTV recording	For security and health and safety purposes	CCTV Data	Our Legitimate Interests

5. OUR WEBSITE

When visiting our website, we will not attempt to identify you as an individual user or collect personal information from you.

We may sometimes include on our website, links to third party websites. We are not responsible for the content or privacy practices employed by websites that are linked from ours.

Our website uses certain cookies. Our cookie policy can be accessed [Saint Joseph's Shankill Cookie Statement](#)

6. WHO DO WE SHARE THIS INFORMATION WITH?

We may share your personal data with our selected business associates, suppliers and contractors to provide you with our services (data processors). For example, these business partners may include:

- Medical Professionals including doctors, occupational therapists, dentists, dieticians, opticians and hospice carers.
- Our Pharmacy Partners
- Our Catering Services
- Our Incident Management Platform
- Our Recruitment Platform Providers
- Our Web Hosting Providers
- Archive/Shredding Providers
- Your Insurance Company, where you have given us the details to pay for your treatment.
- Our Professional Advisers, such as legal advisors, insurance advisors, etc.

In addition, we may disclose your personal information:

- If we are under a duty to disclose your information in order to comply with a legal obligation or where there is a requirement to report to a statutory agency, for example:
 - To HIQA
 - The Irish Medicines Board
 - To the Revenue Commissioners
 - The Gardaí or other law enforcement agencies
- As part of a project with other companies in the Saint John of God Hospitaller Services Group.
- Where the healthcare professional reasonably believes the use or disclosure of your personal data is necessary to lessen or prevent a serious and imminent threat to an individual's life, health or safety or a serious threat to public health or public safety.



- To enforce or apply our terms of use and other agreements or to protect our rights, property, or the safety, our customers, or others. This may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- 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.
- If we, or substantially all of our assets are acquired by a third party, information held by us about our customers and service users will be one of the transferred assets.

A list of our data processors is available from the DPO.

7. HOW LONG DO WE KEEP HOLD OF YOUR INFORMATION?

The time periods for which we retain your information depends on the type of information and the purposes for which we use it. We will keep your information for no longer than is required or permitted.

We have a Policy and Schedule in relation to the Retention of Records that aligns with the HSE 2013 Retention Schedule and other industry standard guidelines.

For further information on the periods for which your personal data is kept, please see our Data Retention Policy which can be accessed from the DPO.

8. TRANSFERS OUTSIDE OF THE EUROPEAN UNION OR EUROPEAN ECONOMIC AREA

In extremely limited circumstances, we may need to transfer your personal data outside of the European Economic Area (EEA).

In such cases, we will ensure that any transfer of your personal data to countries outside the EEA is subject to appropriate safeguards meaning that your personal data will receive the same level of protection as within the EEA and under the principles set out in this Privacy Notice.

9. AUTOMATED DECISION-MAKING AND PROFILING

SJOGH CLG does not carry out Automated Decision Making or Profiling activities.

10. WHAT ARE YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA?

You have the following rights:

- The right to access the personal data we hold about you
- The right to require us to rectify any inaccurate personal data about you without undue delay



- The right to have us erase any personal data we hold about you in circumstances such as where it is no longer necessary for us to hold the personal data or, in some circumstances, if you have withdrawn your consent to the processing
- The right to object to us processing personal data about you such as processing for profiling or direct marketing
- The right to ask us to provide your personal data to you in a portable format or, where technically feasible, for us to port that personal data to another provider provided it does not result in a disclosure of personal data relating to other people
- The right to request a restriction of the processing of your personal data

You may exercise any of the above rights by contacting the DPO –

Address: Data Protection Officer, Saint John of God Hospital, Stillorgan, Co. Dublin, A94 FH92

Phone: +353 1 639 2958

Email: DPOHosp@sjog.ie

You may lodge a complaint with your local supervisory authority with respect to our processing of your personal data. The local Supervisory Authority in Ireland is the Data Protection Commission. The website is www.dataprotection.ie

HOW TO MAKE A DATA SUBJECT ACCESS REQUEST

Requests for access to personal data should be made to the Data Protection Officer or the Services Manager. To ensure that we can action your request as quickly as possible, we ask that you include the following information in your request:

1. Identify the records or information that you require.
2. Provide full personal contact details.
3. Provide a copy of one form of identification, i.e., passport or driving licence.

If you are making a request on behalf of another individual, we will require written authority from that individual in order to release their records to you.

11. FUNDRAISING AND MARKETING MESSAGES

If you have opted-in to receive marketing communications from SJOGH CLG, we will use the details you provide to us to send you updates on important information, upcoming events, fundraisers etc., happening at SJS.

You have the right to ask us not to process your personal details for such purposes and you can change your mind and 'opt out' of receiving marketing updates at any time.



HOW TO OPT-OUT

To do so, simply click the 'unsubscribe' button located at the bottom of any email which you receive from us.

Alternatively, send us an email, writing "unsubscribe" in the subject heading to DPOHosp@sjog.ie. Please note that opting out of marketing messages will not stop service communications.

12. WHAT WILL HAPPEN IF WE CHANGE OUR PRIVACY NOTICE?

This notice may change from time to time, and any changes will be posted on our site and will be effective when posted. Please review this notice each time you use our site or our services. This notice was last updated in September 2023

13. HOW CAN YOU CONTACT US?

For Data Protection related queries, our Data Protection Officer can be contacted by:

Email: DPOHosp@sjog.ie

Post: Data Protection Officer, Saint John of God Hospital, Stillorgan, Co. Dublin, A94 FH92

14. CORONAVIRUS AND DATA PROTECTION

All measures taken in response to Coronavirus involving the use of personal data, including health data, will be necessary and proportionate. Where SJOGH CLG. is acting on the guidance or directions of public health authorities, or other relevant authorities, Article 9(2)(i) GDPR and Section 53 of the Data Protection Act 2018 will permit the processing of personal data, including the sharing of limited health data, (e.g. reporting results of Coronavirus testing, personal data in relation to the provision of vaccinations to staff, list of staff vaccinations), once suitable safeguards are implemented. Such safeguards may include limitation on access to the data and strict time limits for erasure.

Employers will also have a legal obligation to protect their employees under the Safety, Health and Welfare at Work Act 2005 (as amended). This obligation, together with Article 9(2)(b) GDPR provides a legal basis to process personal data, including health data, where it is deemed necessary and proportionate to do so.