

GDPR for Service Users

February 2026

This Privacy Notice explains how Nasc, the Migrant and Refugee Rights Centre, processes personal data when you engage with our services.

This notice applies to all direct services we provide, including advocacy and casework, social work supports, integration and community initiatives, employment supports, and refugee resettlement activities.

It does not apply to personal data collected solely through our website. A separate Website Privacy Policy applies in that context.

1. Who We Are

Nasc, the Migrant and Refugee Rights Centre
34 Paul Street
Cork City,
Ireland

Email: info@nascireland.org

Phone: 021 427 3594

Nasc is the data controller for personal data processed in connection with our services.

2. How We Collect Personal Data

We collect personal data:

- Directly from you during intake, consultation or registration
- Through signed service agreements or letters of authority
- During helpline calls (we take notes but do not record calls)
- Through referrals from other organisations
- From statutory bodies where relevant
- Through formal resettlement or integration pathways

Engagement with our services is voluntary.

If you choose not to provide certain information, we may not be able to provide the service you request or act on your behalf. We will explain what information is necessary and why.

3. Categories of Personal Data We Process

The type and amount of information processed depends on the nature of the support provided.

We may process:

Basic personal information	<ul style="list-style-type: none"> • Name • Address • Phone number • Email address • Nationality • Languages spoken • Immigration status • Family composition details
Identity and documentation	<ul style="list-style-type: none"> • Copies of passports or identity documents • Immigration reference numbers • PPS numbers where required for official applications
Education and employment information	<ul style="list-style-type: none"> • CVs and employment history • Course or job application details • School information
Family and child-related information	<ul style="list-style-type: none"> • Names and dates of birth of children • Education or support needs • Social work information
Special category data (where relevant)	<ul style="list-style-type: none"> • Health or disability information • Ethnicity • Religion • Sexual orientation • Psychological or medical reports • Protection or vulnerability information
Criminal offence data	Where necessary for safeguarding, immigration advocacy, or legal protection purposes.

Separate records may be created for individual family members where required to support distinct needs.

4. Purposes of Processing

We process personal data to:

- Provide advocacy and immigration-related support
- Support access to education, employment, housing, and social services
- Provide social work and family support
- Coordinate integration and community initiatives
- Support refugee resettlement
- Act on your behalf with public authorities where authorised

- Meet safeguarding obligations
- Comply with funding, legal, and regulatory requirements

5. Legal Basis for Processing

We process personal data under the General Data Protection Regulation (GDPR) on the following bases:

Article 6 – Standard Personal Data

Performance of a service (Article 6(1)(b))

Where you voluntarily engage with our services.

Legitimate interests (Article 6(1)(f))

To administer services, maintain records, coordinate supports, and ensure appropriate oversight and safeguarding.

Legal obligation (Article 6(1)(c))

Where required to comply with safeguarding duties, statutory reporting, financial compliance, or lawful requests.

Public interest (Article 6(1)(e))

Where processing occurs in the context of national resettlement or similar public frameworks.

Article 9 – Special Category Data

Where we process sensitive personal data, this is done under:

Article 9(2)(f) – Establishment, exercise or defence of legal claims

Particularly in relation to immigration applications and formal engagement with authorities.

Article 9(2)(g) – Substantial public interest

Including child protection, safeguarding, humanitarian protection, and equality of opportunity under Irish law.

Article 9(2)(a) – Explicit consent

Where sensitive information is voluntarily provided, such as health information for accessibility purposes.

Article 10 – Criminal Offence Data

Where criminal offence data is processed, this is done in accordance with GDPR and the Irish Data Protection Act 2018, and only where necessary for safeguarding, legal advocacy, or protection purposes.

6. Acting on Your Behalf and Data Sharing

Where authorised, we may act on your behalf and contact public bodies, including immigration authorities, local authorities, education providers, health services, social services, courts or tribunals.

Personal data may also be shared:

- With statutory bodies where required
- With employers or education providers (with your consent)
- Within recognised resettlement frameworks
- Where required for safeguarding or legal compliance

Where appropriate, we rely on a signed letter of authority.

Reporting to funders is anonymised and aggregated. Funders do not receive information that directly identifies individuals.

7. Communications and Messaging Platforms

Some individuals communicate with us through WhatsApp Business accounts or similar messaging platforms. These services are provided by third parties and are subject to their own privacy policies.

We do not record helpline calls.

Where documents or personal information are received through messaging platforms, relevant information is transferred into our secure internal systems and deleted from the messaging platform where appropriate.

Participation in group messaging is voluntary. In group settings, phone numbers may be visible to other participants.

We do not sell personal data and we do not use automated decision-making in providing services.

8. Data Retention

Service records are retained for six years from case closure.

Information may be retained for longer where required:

- For safeguarding purposes
- To comply with legal obligations
- For the establishment, exercise or defence of legal claims

Deletion requests may be refused where retention is legally required.

9. Storage, Security and International Transfers

Records are stored securely using:

- Salesforce CRM
- Microsoft Office 365 systems
- Secure physical files where necessary

Access is restricted to authorised staff. Appropriate technical and organisational safeguards are applied.

Some trusted service providers may process data outside the European Economic Area. Where this occurs, recognised safeguards are applied, including participation in the EU–US Data Privacy Framework and/or Standard Contractual Clauses.

10. Safeguarding and Mandatory Disclosures

Nasc operates under a formal Child Safeguarding Policy.

If we have a safeguarding concern about a child or vulnerable person, we may share information with Tusla or other relevant authorities. Where a referral is made, the fact of the referral will be recorded in the case file.

We may also disclose personal data:

- In response to a lawful request
- To report criminal activity
- To defend legal claims

In such circumstances, disclosure may occur without consent where required by law.

11. Your Rights

Under data protection law, you have the right to:

- Request access to your personal data
- Request correction of inaccurate information
- Request restriction of processing
- Request erasure in certain circumstances
- Object to processing based on legitimate interests
- Lodge a complaint with the Data Protection Commission

Requests can be made to info@nascireland.org for the attention of **Fiona Hurley**.

We aim to respond within one month. If a request is complex, we may extend this by up to two further months, and we will inform you if this is necessary.

The supervisory authority in Ireland is the Data Protection Commission.

12. Changes to This Notice

We may update this Privacy Notice from time to time. The most recent version will be made available to service users.