

### MABS Data Protection Notice

Version	Prepared By	Approved by	Date
1.0	Citizens Information Board	Citizens Information Board	24 May 2018
2.0	Citizens Information Board	Citizens Information Board	25 May 2021
3.0	Castlebridge & Citizens Information Board	MABS Companies	14 April 2022

#### Who are we and what do we do?

MABS, the Money Advice and Budgeting Service, is the State's only free money and debt advice service in the Republic of Ireland. MABS provides information and advice to people with problem debt or money worries online, over the phone or face to face and is governed by 8 regional companies as follows:

Company Name	Responsible for services delivered in the following areas:	Registered Company Number
North Connacht & Ulster Money Advice & Budgeting Service CLG	Monaghan, Cavan, Sligo, Leitrim & Donegal	629838
South Connacht Money Advice & Budgeting Service CLG	Galway, Mayo, Roscommon	629659
North Munster Money Advice & Budgeting Service CLG	Clare, Limerick, Tipperary & Waterford	629811
South Munster Money Advice & Budgeting Service CLG	Cork & Kerry	621210
North Dublin MABS CLG	MABS National Helpline, 0818 07 2000, National Abhaile Voucher Desk, Request a call back service  Ballymun, Blanchardstown, Coolock, Dorset St., Finglas & Swords.	629661
Dublin South Money Advice & Budgeting Service CLG	Ballyfermot, Clondalkin, Crumlin, Dun Laoghaire, Dundrum, Francis St., Lombard St. & Tallaght	621443



North Leinster Money Advice & Budgeting Service CLG	Kildare, Longford, Louth, Meath & Westmeath	621211
South Leinster Money Advice & Budgeting Service CLG	Carlow, Kilkenny, Laois, Offaly, Wicklow & Wexford.	629812

Two further MABS companies provide support to the Regional companies

MABS Support CLG	Technical casework advice, quality, training, social policy & research, money management education, financial inclusion.	662473
National Traveller MABS CLG	Financial inclusion, community education, social policy please visit <a href="http://www.ntmabs.org">www.ntmabs.org</a> for further information	395431

All MABS organisations are funded by the Citizens Information Board, a state agency, located at Georges Quay House, 43 Townsend Street, Dublin 2.

As per Data Protection Legislation we are a Controller of personal data supplied to us by you. The purpose of this document is to supply relevant information in relation to the processing of that personal data.

### Who do we process data about?

We process personal data of the following types of people:

- Clients
- MABS Staff
- MABS Board members
- Web visitors
- Professional contacts

### What kind of personal data do we process?

We process different types of personal data for different functions that we perform.

<u>Category of Individual</u>	<u>Types of Personal Data Processed</u>
Clients	Background information in relation to queries, case files, contact information, cctv
MABS Staff	Relevant employee/staff information, cctv
MABS Board Members	Relevant information to satisfy requirements of Companies Registration Office & Charity Regulator etc.

Web visitors	Cookies
Professional contacts	Contact information, cctv

### What personal information (data) do we collect from clients?

Personal data sought will vary depending on your circumstances and the services you require. For the most part it will be contact/financial information. We ask you to disclose only as much information as we need in order to provide you with our services or to submit a question, a suggestion or a comment in relation to our services.

Examples of the data necessary to provide the service, may include.

Name	SFS documentation
Address	Loan/billing details
PPSN	Utility bills
Banking info	

### How do we get your information?

Personal data may be given to MABS via communications technology: email, text, instant messaging (Whatsapp), social media or by attending meetings either in person, online using video conferencing apps e.g. MS Teams or Zoom, or by telephone.

With your authorisation we may obtain records relating to your situation, such as those held by your creditors or financial institutions. The records that we may obtain will vary depending on your circumstances and the third parties involved.

We may use the information for the following purposes:

- Contact you to arrange appointments or to return your calls
- Refer you to a Money Advice and Budgeting Service
- Assess your circumstances and to recommend courses of action
- Engage with third parties in relation to your situation, including public and private organisations
- Assist you to fill in forms relating to public and social services
- Assist you in any steps involved in accessing public or social services
- Assist you in any steps involved in maximising your income
- Conduct statistical analysis and reporting, for training purposes, for quality review purposes and for social policy purposes

### How long do we keep personal data for?



We keep your data in accordance with our retention policy and only for as long is necessary or in accordance with relevant legislation. A copy of the retention policy may be available upon request.

### **What are our legal basis for processing?**

Every form of processing we undertake has a legal basis under Article 6 GDPR. In the main we rely on either an individual's consent, processing in the public interest or contract as a legal basis. For the purposes of CCTV usage and security in general we may rely on the legal basis of legitimate interests.

We may be also obliged to process certain information in line with our reporting obligations as are set out in statute. An example of this would be certain employee information shared with Revenue.

### **Where do we process your Personal Data?**

In the course of processing personal data, we contract 3rd parties to process some activities on our behalf. These are at all times done in accordance with Data Protection Law. In general, MABS seeks to keep all personal data within the EU, however any transfers of personal data outside of the EU are done in accordance with the Relevant Legislation.

### **Do we share your Personal Data?**

Bar legal obligations, where we are obliged to share your personal data, we share personal data with:

- Other MABS agencies, for the purposes of providing further services to you
- Financial institutions, to help with your financial situation
- Service providers: such as CRM/email hosting services
- Insolvency Service of Ireland for Debt Relief Notice applications.
- Voluntary or Charitable organisations for the purpose of providing further assistance to you.

Details of these organisations are listed in Schedule 1

We attach at Schedule 2 an additional list of organisations with whom your personal data may be shared if you avail of the Scheme of Aid & Advice for Borrowers in Home Mortgage Arrears (the Abhaile Scheme).

### **What are your rights?**

We will process your data in accordance with our policies and Data Protection Law. Individuals have rights in relation to the processing of their personal data under EU law. These rights are not absolute, and some qualifications and restrictions do apply. MABS is committed to helping individuals exercise their rights.



In summary your rights are access; rectification; to be forgotten/erasure; restrict processing; to object; portability; to refuse automated decision making and/or profiling.

In the event that your rights have been infringed you have the right to seek compensation through the courts or to make a complaint to the Data Protection Commission.

### How to make a Data Subject Access Request?

A client, staff member or professional contractor of MABS may make a data subject access request by contacting the Data Steward at the address or email below. Verification of your identity may be required.

### How to contact us?

If you seek any information in relation to the processing of your personal data please feel free to contact the **Data Steward** at the relevant contact address or email below:

Company Name	Address	Telephone	Email
North Connacht & Ulster MABS	2 <sup>nd</sup> Floor, Elm House, Cavan.	0818 072410	<a href="mailto:ncu.dataprotection@mabs.ie">ncu.dataprotection@mabs.ie</a>
South Connacht MABS	Cualgara, Teeling St., Ballina, Co. Mayo	0818 072660	<a href="mailto:sc.dataprotection@mabs.ie">sc.dataprotection@mabs.ie</a>
North Munster MABS	6B Wallace House, Maritana Gate, Canada Street, Waterford	0818 072050	<a href="mailto:nm.dataprotection@mabs.ie">nm.dataprotection@mabs.ie</a>
South Munster MABS	101 North Main Street Cork T12 AKA6	021 2298487	<a href="mailto:sm.dataprotection@mabs.ie">sm.dataprotection@mabs.ie</a>

North Dublin MABS	Finglas Office, 5 Church St., Finglas, Dublin 11, D11 XF78	0818 072170	<a href="mailto:nd.dataprotection@mabs.ie">nd.dataprotection@mabs.ie</a>
MABS National Helpline	Commercial House, Westend Commercial Village, Blanchardstown, Dublin 15	0818 072330	<a href="mailto:hl.dataprotection@mabs.ie">hl.dataprotection@mabs.ie</a>
Dublin South MABS	1A Upper Kilmacud Road, Dundrum, Dublin 14, D14 EY13	0818 072310	<a href="mailto:ds.dataprotection@mabs.ie">ds.dataprotection@mabs.ie</a>
North Leinster MABS	1st Floor, 1B Brews Hill Navan, Co. Meath C15 XR8	0818 072680	<a href="mailto:nl.dataprotection@mabs.ie">nl.dataprotection@mabs.ie</a>
South Leinster MABS	Unit 72d, Tullow Street, Carlow	0818 072070	<a href="mailto:sl.dataprotection@mabs.ie">sl.dataprotection@mabs.ie</a>
MABS Support CLG	Commercial House, Westend Commercial Village, Blanchardstown, Dublin 15	0818 07 2020	<a href="mailto:ms.dataprotection@mabs.ie">ms.dataprotection@mabs.ie</a>

#### Contact Details for the Office of the Data Protection Commissioner

Telephone: +353 57 8684800 / +353(0)761 104 800 / Lo Call No. 1890 252 231

Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)

Address: 21 Fitzwilliam Square South, Dublin 2, D02 RD28

#### What will happen if we change our privacy notice?

This notice may change from time to time, and any changes will be posted at [www.mabs.ie](http://www.mabs.ie) website and will be effective when posted.

This notice was last updated on 14 April 2022

### Schedule 1: General MABS Services

We have set out below a list of third parties with whom we may share your data.

Third party	Description
Any legal successors to the Money Advice and Budgeting Service Support CLG	Where the Money Advice and Budgeting Service company transfers its business to another company or merges with another company.
Other Money Advice and Budgeting Service (MABS) entities	Where we refer your case to another MABS entity in order to provide services, or where case support or case review from another MABS company is required. Examples include where your case is sent to a Dedicated Mortgage Arrears Adviser or a Relief Money Adviser who may work in a different MABS entity.
MABS Support CLG	<ul style="list-style-type: none"> <li>• In the provision of case management systems</li> <li>• In the provision of technical advice and case support</li> <li>• In conducting statistical and case analysis for the purposes of reporting, training, review and social policy</li> <li>• In order to provide quality or case reviews.</li> </ul>
Citizens Information Board	<ul style="list-style-type: none"> <li>• In the provision of ICT hardware and software, networks and network storage, case management systems, email, telephony and helpdesk services</li> <li>• In the provision of messaging or online chat and website services through <a href="http://www.mabs.ie">www.mabs.ie</a></li> <li>• In conducting statistical and case analysis for the purposes of reporting, training and social policy</li> <li>• In the investigation of a complaint in accordance with our complaints procedures</li> <li>• In conducting company audits or quality reviews.</li> </ul>
ICT providers	Where ICT services such as hosting, software, storage 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.

Shredding companies	Where our files are securely destroyed by a third party.
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Depending on your circumstances, and with your authorisation, we may also share your data with other third parties.

Third party	Description
Creditors, financial institutions & utility companies.	We may need to contact your creditors and financial institutions to request information from them about the debts you have and the balances on all accounts held with them. We may also need to give them information about your overall financial situation, including your income and expenditure, your assets, a full list of debts and the outstanding balance on any accounts you have.
Public bodies	Where we refer you to a public body or assist you in accessing the services of a public body, for example, the Financial Services and Pensions Ombudsman.
Voluntary/ Charitable organisations	Where we refer you to a voluntary organisation or assist you in accessing the services of a voluntary organisation, for example, Chartered Accountants Voluntary Advice (CAVA) or Society of St Vincent de Paul (SVP).
Insolvency Service of Ireland (ISI)	If you wish to avail of a Debt Relief Notice through the Approved Intermediary Service, MABS will share your data with the Insolvency Service of Ireland (ISI). This is part of the application process and we are required to send your file to the ISI if your application is successful.

## Schedule 2: Abhaile, the Scheme of Aid and Advice for Borrowers in Home Mortgage Arrears

MABS is one of a number of organisations providing Abhaile, the Scheme of Aid and Advice for Borrowers in Home Mortgage Arrears. If you wish to avail of this scheme, your data may be shared with the organisations involved in the scheme and with external advisers in addition to the third parties listed in Schedule 1.

Third party	Description
North Dublin MABS, Citizens Information Board, Legal Aid	Your data will be shared between the organisations providing Abhaile, the Scheme of Aid and Advice for Borrowers in Home Mortgage Arrears to check that you are eligible for free financial and legal advice and aid under



Board, Insolvency Service of Ireland,	the scheme, as well as to measure how effectively the scheme is working to help borrowers using it.
Advisers providing advice as part of the scheme	For advice purposes, more detailed data will be shared between the relevant advisers working with you under Abhaile, the Scheme of Aid and Advice for Borrowers in Home Mortgage Arrears. This may include your Standard Financial Statement or Prescribed Financial Statement and a copy of the written financial advice or legal advice provided to you. The advisers are the MABS adviser, the Personal Insolvency Practitioner (PIP), the consultation solicitor, the duty solicitor and/or the accountant who are providing you with advice and assistance within the scheme. These advisers may be obliged to retain client files for certain periods of time – for example, a solicitor or PIP is obliged under professional oversight regulations to keep client files securely for a minimum period.