

# Irish Canadian Immigration Centre

## PRIVACY POLICY

Effective Date: May 16, 2025

Last Revised: January 2026

The Irish Canadian Immigration Centre (the “Centre”) recognizes the importance of privacy and is committed to maintaining the accuracy, confidentiality and security of our clients’ personal information. This privacy policy describes the personal information that the organization collects, including through the website at [irishcanadianimmigrationcentre.org](http://irishcanadianimmigrationcentre.org) (the “Website”). This policy also describes how we manage, protect and disclose personal information.

This policy does not address how we handle personal information about our employees or job applicants. If you are an employee and have any questions about how your personal information is handled, please contact us.

Please read this policy carefully. By providing us with your personal information, you agree and consent that we may collect, use and disclose your personal information in accordance with this privacy policy. If you do not agree with these terms, please do not provide any personal information to us. Should you have any questions regarding this policy, please contact us at the information [provided below](#).

### What is Personal Information?

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information about you in any form, such as name, phone number, email address, immigration information, financial details, personal story, as well as photos and video recordings.

### What Information Do We Collect, and How Do We Use that Information?

The Centre collects various types of personal information, depending on how you interact with us. The information we collect generally falls into the following categories:

- 1. Providing Basic Client Services.** When we provide services to you as a client, we strive to collect only what is reasonably necessary to establish our relationship, provide you with services you request, and track our volume of clients internally. This information may include your name, contact information (e.g., phone, email, etc.), gender, age range, and the details of your request. This information will generally be collected directly from you or your authorized representative in person, by phone or through email.
- 2. Additional Client Services.** All our clients come to us with their unique needs, and therefore it is difficult to fully capture the types of personal information that we may collect. Depending on the nature of your request, we may need to collect additional details about you. We strive to only use and disclose this information to provide you with services, or for other purposes set out in this policy. For example:
  - When you ask for help related to a work-related complaint, you may provide your status in Canada, job title, wages, and duties. We may use this information to signpost you in the right direction.
  - When you request career services from us, you may provide your work experience or application materials. We may use this information to signpost you in the right direction.

- When requesting information for social care services, you may provide us with information about your health care or therapy needs. We may use this information to signpost you in the right direction.
- 3. **Navigating Emergencies.** We are not a crisis support service. However, in situations where a client is at risk of harming themselves, we will try to gain the identifying information needed to contact emergency services on their behalf.
- 4. **De-identified Client Information.** To sustain our service through funding grants, we record and submit generic information about our clients. This information includes gender, age range, nature of signposting, and geographical location. We maintain this information in de-identified form, and may use it to (i) understand our clients; (ii) make decisions about improving our services; (iii) develop new programs, events, and services; and (iv) apply for grants and funding.
- 5. **Surveys.** From time to time, we may send you voluntary surveys about various topics. We will inform you of the purposes of the survey at the time we send it to you.
- 6. **Feedback and Testimonials.** From time to time, you may provide feedback or testimonials (including written, oral or video testimonials). We may use your feedback to improve our services. We may use your testimonials in our promotional materials (e.g., Website, social media, brochures, etc.). Please let us know if you do not want your testimonial or feedback to be used in this way.
- 7. **Photos or Videos at Events.** When you participate in an event, we may ask to take your photograph or video for promotional purposes (e.g., Website, social media or brochures). We will generally ask for consent before taking your photo. Please let us know if you do not wish for us to use your photo, or if you would like a photo of you taken down.
- 8. **Volunteer Information.** We collect certain information about volunteers to manage the volunteer relationship. This includes name, contact information, and emergency contact details. We use this information to contact you, manage the volunteer relationship, and respond to emergencies.
- 9. **Video Surveillance.** Our office building is equipped with security cameras at entrances and exits and common areas. We may request access to video surveillance footage in the event of an investigation or emergency. We otherwise do not control how the building collects, uses or discloses information through video cameras. If you have any questions about video surveillance, we can put you in touch with the building manager.
- 10. **Website Visitor Data.** Our Website uses cookies and other tracking or logging tools in order to allow certain parts of the Website to function. These tools do not collect personally identifiable information.
  - We also use Google Analytics, which uses cookies and other tracking technologies to collect data about our Website visitors. If you visit the Website, these tools may collect information from you such as your device type, browser, location (based on IP address), pages visited, time spent, and how you arrived at the Website. We only receive anonymized and aggregated information from Google Analytics, which we use to

troubleshoot and improve the Website. You can opt out of Google Analytics by visiting [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).

11. **Other Purposes.** In addition to the purposes above, we may use any personal information we collect for security and fraud prevention, to defend legal claims, comply with applicable laws, or otherwise as permitted or required by law.

### How Do We Disclose or Share Your Personal Information?

Depending on your relationship with us, and any client services you request, we may share or disclose your information in various ways. Generally speaking, it will be obvious when we disclose personal information and why we are doing it.

- **Staff and Workers.** The Centre shares your personal information with employees, independent contractors and/or volunteers who require such information for us to establish, manage and maintain our relationship with you.
- **Signposting to Third Parties.** We may disclose your information to third parties where necessary to provide you with the service you request. For instance:
  - You may ask us to seek assistance from a local MP to liaise with Immigration, Refugees and Citizenship Canada (IRCC) on your behalf. In these circumstances, we may need to collect your IRCC Client ID Number (also known as your UCI) and your date and place of birth. We may share this information with your local MP in order to allow them to provide services to you.
  - If you ask us to call the Embassy of Ireland on your behalf to liaise with them regarding a lost or stolen passport or similar matter, we may need to collect and disclose additional details such as your passport information.
  - With your permission, we may share your information with an independent immigration lawyer, social care advisor or other consultant with whom we are liaising on your behalf.

Please note, we cannot control how these third parties handle your personal information, and accordingly, we are not responsible for any misuse of personal information by these third parties. Furthermore, these signposts are not referrals—you must do your own research on outside services, and the Centre is not responsible or liable for fees, information or services given by third party providers.

- **Service Providers.** We may also share personal information with third-party service providers that provide services on our behalf. For example, we use cloud-based office software (e.g., Microsoft Outlook). Our software provider may therefore process and store information sent to us via email. We also use Google Analytics as described at the “Website Visitor Data” section above to collect information about visitors to our Website.
- **Consultants.** From time to time, we may seek advice from consultants, such as accountants and lawyers, in which case we may need to share some personal information with these providers.
- **Event Management Providers.** We use event management platforms (e.g., Eventbrite) to manage event sign-ups and ticket sales. When you register for an event through a third-party provider, the personal information you provide (such as your name, email address, and payment details) is collected and processed in accordance with the provider’s own privacy policy. We may receive limited information from these providers for the purpose of managing event attendance, communicating event-related information, and maintaining our records. We do not control how

these providers use or store your data, and we encourage you to review their privacy policies for more information.

- **Addressing Significant Risks.** Consultations with the Centre remain private and confidential, within the limits of the law. For example, we may need to disclose personal information in the following circumstances:
  - Risk of harm or violence to you or anyone else;
  - Suspected child abuse or neglect;
  - Contact details and medical information in the case of emergency (ambulance/hospital emergency); or
  - Information regarding risks involved in the operating of a motor vehicle.
  
- **Other.** We may also disclose personal information with your explicit consent, or where otherwise permitted or required by law (such as in response to a court order or request from law enforcement).

### **Cross-Border Transfers of Personal Information**

We may engage third-party service providers who may process or store your personal information outside of Canada, including in the United States. Personal information that is processed outside of Canada may be accessible to foreign courts, law enforcement and national security authorities. If you are in Quebec, your personal information may be communicated outside Quebec.

If you are located in Alberta, you may contact our Executive Director at the information provided below in order to (i) obtain written information about our policies and practices with respect to service providers outside Canada; or (ii) ask questions about the collection, use, disclosure or storage of personal information by service providers outside Canada for or on our behalf.

### **How Do We Protect Your Information?**

The Centre takes reasonable measures to ensure that personal information is kept safe from loss or theft, unauthorized access, use, copying, disclosure or modification. These measures include physical, administrative and technical measures. However, no method of security is 100% effective. Therefore, we cannot fully guarantee the security of your personal information.

While electronic communication can improve client engagement, it can also present unique challenges to client privacy and confidentiality. We cannot guarantee the security of email messages. Messages may be seen by others using the internet. Email is easy to forge and may be accidentally forwarded.

### **Maintaining Accuracy**

The Centre takes steps to maintain the accuracy of your personal information. However, you are responsible for ensuring that any personal information you submit to us is accurate. Please let us know if your information changes.

### **How Long Do We Your Information?**

The Centre keeps personal information only as long as it is required for the reasons it was collected. The length of time we retain information varies, depending on the program, service or event and the nature of the information. We may keep your personal information beyond your relationship with you, such as to comply with record-keeping obligations or ensure we have a record of our interactions for legal purposes. When your personal information is no longer required, we will destroy or delete it.

Generally speaking, we automatically delete records after four or seven years, but may retain records for a longer period where required by law.

### Roles and Responsibilities

The personal information that we collect is accessible to employees that need access to perform their duties, such as our directors, advisors, and administrative assistants.

Our Executive Director has overall responsibility for our compliance with applicable privacy laws, including responsibility for the day-to-day administration and implementation of our privacy program, such as by developing and delivering privacy training to relevant personnel, establishing relevant policies and procedures, investigating and responding to complaints and potential violations of our privacy policies or relevant laws, responding to requests from individuals to exercise their rights under applicable privacy laws, and regularly reviewing and identifying opportunities to improve our privacy program.

All other personnel are responsible for: protecting the confidentiality and security of any personal information they handle in connection with their employment; following our security measures and policies and procedures for handling personal information; refraining from any unauthorized access, use or disclosure of personal information; and reporting security or confidentiality incidents.

### Your Privacy Rights

You may have various privacy rights, depending on the province in which you are located and the applicable laws. The rights set out below are subject to any limitations set out in applicable law.

- Access: You can request access to your personal information.
- Correction: You can request correction of any inaccurate personal information.
- Withdrawal of Consent: You may withdraw your consent to the continued collection, use, communication, and disclosure of your personal information. Withdrawing consent may impact the availability of certain services.
- Portability: If you are a resident of Quebec, you can request a copy of your personal information in a structured, commonly used technological format.
- Complaint. You may submit a complaint to us about our collection and processing of your personal information.

To exercise any of your privacy rights, please contact us at the information set out below. We might need to verify your identity in order to process your request.

### Complaint Handling Process

We have a process for dealing with complaints related to the protection of personal information.

1. We will acknowledge your complaint without undue delay.
2. We take appropriate steps to confirm your identity, get details of the complaint and any relevant documentation.
3. We consider applicable laws.
4. We conduct an appropriate, fair and impartial investigation.
5. We share the outcome with you, including any remediation measures we take (where justified).

### Links to Other Websites

The Centre provides links to other websites which we believe may be of interest to you. Please be aware

that the Centre is not responsible for the privacy practices of other websites. We encourage you to read the privacy statements of each and every website that requests personal information from you.

### **Changes to This Policy**

From time to time, we may need to make changes to this privacy policy, for example, as the result of government regulation, new technologies, changes to our information handling practices or other changes in data protection laws. You should check the Website periodically to review the most up to date privacy policy. Where required by law, we may reach out directly to inform you of changes.

### **Contact Us**

If you have any questions about this privacy policy, or how your personal information may be handled, please contact us at the information below.

Executive Director  
Irish Canadian Immigration Centre  
44 Victoria Street  
Suite 1620  
M5C 1Y2  
Telephone: (416) 603 9549  
E-mail: [cmurphy@irishcdn.org](mailto:cmurphy@irishcdn.org)