



This policy is relevant to the spunout (Community Creations CLG) service Text About It. Community Creations is undergoing a rebrand which will result in a name change to spunout. Once the legal name change has taken place this policy will be updated. 50808 and spunout.ie are currently trading names of Community Creations CLG.

Policy Name	DP09 Shortened and Simplified Privacy Policy 50808	Policy Number	DP09
Effective Date	26th November 2022	Owner	BOD
Related Policies	DP01 Data Protection Policy / DP01 DP02 Data Breach Policy DP03-508 Data Protection Policy 50808 / DP03 DP04 Data Subject Access Request / DP04 DP05-508 Texter Terms of Service / DP05 -508 DP07-508 Volunteer Privacy Policy 50808 / DP07-508 DP08-508 Texter Privacy Policy / DP08-508		

Version History		
Version	Description of Change(s)	Approval Date
A	Full review of policy	10.05.2022
B	Section 4.6 (5)	28.02.2023

Purpose



The purpose of this policy is to inform texters and the general public, in clear and concise language, how and why 50808 processes service user data, the rights of data subjects in relation to their data, and how they can contact the organisation with questions or concerns about their data. This is the version of the policy that will be available as content on our website. This is for public consumption and is a shortened and simplified version of our full Privacy Policy.

Scope

This policy concerns all personal data gathered by Community Creations CLG for the 50808 service. Data Subject Access Requests concern data held by the organisation as a whole, and not just data held for the operation of 50808.

Policy Content

Important notices:

- If you're at serious risk to yourself or others, we will need to reach out to emergency services to keep you and/or others safe.
- If you're under 18 and you tell us you are at risk of abuse or neglect, we will need to reach out to emergency and/or TUSLA to keep you safe.
- If you give us information about an alleged abuser, where other children may be at risk, we will need to reach out to Ireland's child protection agency TUSLA.

[Find out more by clicking the links below:](#)

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Who are we? What do we do? How can you contact us?

At 50808 our goal is to help people in crisis. We provide a messaging service through text and WhatsApp to help people who feel they are going through a crisis. Our team of trained Volunteers are there to help 24 hours a day, 7 days a week.

A crisis can be many things, like dealing with stress, overwhelming feelings, depression, anxiety, panic, self-harm, suicidal thoughts, trauma related to violence or sexual assault, or any concerns regarding your mental health or that of your loved ones.

50808 is funded by the Health Service Executive (HSE). Our legal name is 'Community Creations CLG' and we are a registered charity in Ireland. Our registered charity number is 20057923.

You can always contact us by emailing hello@text50808.ie for general enquiries, or dpo@text50808.ie for questions about our use of your data.

What happens when you message us?

Our service is provided by trained Volunteers under the supervision of paid staff, known as Supervisors.

When you message us by text or WhatsApp, our system uses your phone number to connect you to trained Volunteers. **Our Volunteers do not see your phone number.** They will only know information that you tell them directly.

50808 Supervisors will have access to all messages from your phone number, **but not your phone number itself.** The reason for this is to make sure that everyone is safe and that conversations between you and our Volunteers are overseen by experienced and qualified mental health and social work professionals. Supervisors use past conversations to make decisions on reporting risk.

In some emergency situations, we will have to make a special request to access your phone number so that we can connect you to resources to help you. [Click here to read more.](#)

You may contact us by email at dpo@text50808.ie with any questions you may have about the data we collect, or about this notice.

If at any time you no longer wish to receive messages, you may opt out at any time by texting the word STOP.

What personal information do we collect about you?



If you contact us, we will collect some personal information about you. We need the content of your messages to us, so we can respond to your questions and thoughts. Our Volunteer may also take notes in the course of your conversation so we can properly assist you.

We will need your phone number only in emergency situations so we can contact you.

We also record information on delivery of individual messages, like the time the message was sent, and technical information about your message, such as message ID, your phone provider and **what the message was about**. This anonymous information, which cannot identify you to us, is used in order to learn how we can better help people who use the service. It is also used to build research into mental health trends in Ireland.

Who helps us? How do they use your personal information?

In order to provide our service, we rely on a service model and technology system built and managed by **Crisis Text Line** in the USA. We use the system separately from Crisis Text Line and host your data on **AWS**, in data centres located in Ireland. Crisis Text Line is only authorised by 50808 to process your data where it is necessary to provide you with our services, and only in compliance with data protection laws applicable to Ireland.

If you choose to communicate with us through **WhatsApp**, we rely upon **WhatsApp Business** to let us talk to you. If you want to find out more about the way that WhatsApp uses your data, you can see their terms [here](#).

Sharing personal information with others

At 50808, we understand how important confidentiality is to you. It's vital that you feel safe in trusting us. And so, we want to be clear about the circumstances when we may need to share information you provide to us with third parties. For example, we may share your information in the following situations:

- If you ask us to.
- If we believe that your life or the life of someone else is in danger, we will contact emergency services to keep you and/or others safe.
- If you are under 18 years of age and have been hurt, abused or neglected now, in the past, or are at risk of this, we will need to reach out to emergency services and/or TUSLA (Ireland's Child Protective Agency) to keep you safe.
- If you give us information about an alleged abuser, where other children may be at risk, we will need to reach out to TUSLA.
- If you tell us you are endangering the safety of another person, we will need to contact emergency services.

Where do we keep your information? How long do we keep it?

We hold all of your data securely in Ireland and Germany, and any companies who work with us are obliged to keep your personal data in the European Union/European Economic Area.



Where legal data transfer agreements outside the EU/EEA are in place, appropriate measures will be taken by 50808 in order to ensure compliance with EU Data Protection law.

Personal data, including your telephone number and any text messages you send to us, will be stored for 7 years after you last contact us. Once this time has passed, we will permanently delete this data from our records. If you contact us again, we will not have any record of our previous conversations with you.

Abusing the service

If we think that someone is abusing the service we will end their access to 50808. Abusing the service can mean any of the following:

- Using the service to break the law;
- Threatening, harassing, or otherwise inappropriately communicating with Volunteers or Staff of 50808;
- Pretending to be another person or entity;
- Using the service to try to exploit or harm minors;
- Taking screenshots, copying, or otherwise sharing conversations or information about the 50808 platform, except to report behaviour you believe may be illegal or abusive;
- Spamming or collecting personal information of users in order to spam, market, or sell to third parties;
- Doing anything that harms anyone's ability to use our service or which we believe exposes 50808 or users of the service to liability;
- Trying to copy or to discover the source code of 50808 or making your own version of 50808;
- Attempting to interfere with the proper working of 50808.

You can contact us directly at dpo@text50808.ie if you believe any suspicious behaviour on our systems is occurring.

Post-conversation surveys

At the end of your conversation with our Volunteers, you may receive a link to take a survey. This is to help us learn from you and improve our service.

- You do not have to take the survey.
- If you choose to take the survey, you do not have to answer all of the questions.
- Responses are anonymous.
- If you leave a note for your Crisis Volunteer, we'll share it with them. Your note might also be used for promotional material and training, but will remain anonymous.

What are your rights and how can you use them?



You have rights to your personal data under EU law, and 50808 is committed to helping you use your rights. The relevant data rights you have with us are:

- The right of access to your data;
- The right to fix any mistakes in your data;
- The right to erase your data;
- The right to object to us processing your data;
- The right to restrict us from processing your data;
- The right to object to us processing your data, including automated processing of your data;
- The right to ask for your data in a commonly-used, machine readable format (e.g., xlsx, csv);
- You also have the right to seek compensation through the courts in the event that your data privacy rights have been infringed.

If you want to exercise your right to access a copy of the information we have about you, please email us at dpo@text50808.ie with the subject title 'Data Access Request'. You will receive a response within one week where we will ask you to verify your identity. We will need the following information before we can process with your Data Access Request:

- Your name
- The phone number(s) with which you contacted 50808
- Proof of your identity, either through a copy of an official document such as a Passport or Driver's License; an official bill or correspondence in your name.
- Depending on the nature of your data, we may also request further information such as the date(s) on which you contacted 50808 or the details of any official data you believe we may hold on you.

Once your identity has been verified, we will aim to send you a copy of all of your data currently held by 50808 within 30 days. If for any reason we cannot share your data within this timeframe, due to legal or technical reasons, you will receive an explanation of why this is the case.

If you want us to erase your personal data, please text **'ERASE'** to **50808** using the same phone number you texted us with. You will receive a message asking you to confirm your request. You can also request us to erase your personal data via email at dpo@text50808.ie, which will be subject to the same verification procedures as a data access request, as set out above.

You will receive a response to your erase request within 30 days and we will make reasonable efforts to process requests promptly. If we cannot delete all of your data right away for legal reasons, you will receive an explanation of why this is the case.

For any other queries in relation to your rights you can email us at dpo@text50808.ie.

Can I contact the Data Protection Commission?



You have the right to contact the Data Protection Commission if you have any concerns or complaints about 50808 and how we process your data.

Website: www.dataprotection.ie

Telephone Number: +353 57 8684800 / +353(0)761 104 800

Address: Data Protection Commissioner, 21 Fitzwilliam Square, Dublin 2, D02 RD28