



## Table B

### How we use personal data we collect – Birth Information and Tracing Services

*We will only use your personal data for the purposes and legal bases set out in the table below. In accordance with our legal obligations under the BITA 2022, we will only ever make an entry in the CPR where the person in respect of whom the entry is made has given us their prior consent to the making of the entry.*

<b>Relevant Persons, Qualifying Persons, or Qualifying Relatives applying for Birth Certificates, Birth information (including Early Life, Care and Medical information) and provided items relating to a parent or relevant relative</b>		
<b>Purpose/Activity</b>	<b>Type of Personal Data</b>	<b>Lawful basis of processing</b>
To process your application, including applications for a birth certificate, birth information, photographs, medical information relating to the relevant person.  To process applications for information relating to early life, care, or incorrect birth registration or specified items (such as a letter, photograph, or memento).  This includes applications made on your behalf, applications made by you on behalf of a minor, applications made by you in respect of your parent's birth information, and applications made by you in respect of a relative.	Personal data contained in 'Relevant Records' as defined in Section 2 of the BITA 2022 i.e.  (a) relating to a relevant person that contains birth information, early life information, care information or medical information relating to him or her, or a photograph or other image of his mother, father or other genetic relative;  (b) containing or noting a communication from a parent or genetic relative relating to a relevant person, that is held by the Agency, the Authority or a secondary information source;  (c) containing or noting a communication from a relevant person relating to a parent or genetic relative that is held by the Agency, the Authority or a secondary information source;  (d) held by the Department of Foreign Affairs relating to the departure from the State, in the period commencing on 1 January 1940 and ending on 31 December 1979, of a child; for the purpose of the effecting of his or her adoption outside the State; or adopted under an adoption order by a person resident in a place outside the State, for the purpose of the child residing with the person; prescribed, or a record of a class prescribed, under section 43 (1).	(a) To comply with our legal obligations under BITA 2022, in particular Parts 2, 3 and 4;  (b) For substantial public interest reasons and for the performance of a task carried out in the public interest and/or in the exercise of our official authority under Article 6(1)(e) and Article 9(2)(g) of the GDPR and s.66 of BITA 2022.

**Relevant Persons, Qualifying Persons, or Qualifying Relatives applying for Birth Certificates, Birth information (including Early Life, Care and Medical information) and provided items relating to a parent or relevant relative**

Purpose/Activity	Type of Personal Data	Lawful basis of processing
<p>To arrange an information session over a phone call or at a face-to-face meeting as requested, with an adopted person or other relevant person where a 'no-contact' preference has been registered by a birth parent in the CPR, and/or to communicate directly with a person who has chosen a no-contact preference.</p>	<p>This will involve the processing of information in connection with your application (as outlined above) and the processing of your name and contact information in order to arrange the information session.</p> <p>The personal data processed will include the contact details of the adopted person or other relevant person as recorded on the CPR and/or in our own files and records, and where necessary the birth parent who has chosen a 'no-contact' preference</p>	<p>(a) To comply with our legal obligations under BITA 2022, in particular under Part 2;</p> <p>(b) For substantial public interest reasons and for the performance of a task carried out in the public interest and/or in the exercise of our official authority under Article 6(1)(e) and Article 9(2)(g) of the GDPR and s.66 of BITA 2022.</p>

**Individuals applying to the CPR**

<p>To receive and process your application to the CPR with your contact preference in relation to a birth relative or adopted person</p>	<p>The personal data provided on your application form to the CPR, and any personal data recorded on the CPR relating to any relative or adopted person</p> <p>This may routinely include:</p> <ul style="list-style-type: none"> <li>• your name;</li> <li>• your date of birth;</li> <li>• your address;</li> <li>• your contact details;</li> <li>• details of the third parties you would like to contact;</li> <li>• your contact preferences;</li> <li>• identification documents, and</li> <li>• any other information you share with us to help us make a match on your behalf (which may include special category data)</li> </ul> <p>If the application is made in respect of a person other than yourself, we will process certain categories of personal data in respect of the relevant person, including name, date of birth, identification documents, and any other information you share with us to help us make a match on the relevant person's behalf (which may include special category data).</p>	<p>(a) To comply with our legal obligations under BITA 2022, in particular Part 6;</p> <p>(b) For substantial public interest reasons and for the performance of a task carried out in the public interest and/or which is necessary in the exercise of our official authority, under Article 6(1)(e) and Article 9(2)(g) of the GDPR and s.66 of BITA 2022.</p>
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**Relevant Persons, Qualifying Persons, or Qualifying Relatives applying for Birth Certificates, Birth information (including Early Life, Care and Medical information) and provided items relating to a parent or relevant relative**

Purpose/Activity	Type of Personal Data	Lawful basis of processing
To record an entry relating to you in the CPR following receipt of a CPR application from you	As above	Consent under Article 6(1) (a) of the GDPR and (where applicable) Article 9(2)(a) of the GDPR.
To receive, store, safeguard and share information and items lodged by you, that you wish us to give to a specified person. This information or item may be lodged either when you are making an application to the CPR, or when an entry is made by a third party in relation to you on the CPR. We will only pass on the information or item if the specified person has joined or joins the CPR and agrees to accept the item	The personal data will depend on the information lodged, and may include special category data. This might include a letter, a photograph, a memento etc.	(a) To comply with our legal obligations under BITA 2022, in particular Part 6; (b) For substantial public interest reasons and for the performance of a task carried out in the public interest and/or in the exercise of our official authority under Article 6(1)(e) and Article 9(2)(g) of the GDPR and s.66 of BITA 2022.
To make an entry in the CPR, recording the information you have provided to us directly, or which we have received from a third party about you	<p>Your personal data which is recorded on or used in connection with the CPR. This may include:</p> <ul style="list-style-type: none"> <li>• the information you provide us with in your CPR application form;</li> <li>• information already held on the Adoption Authority's files and records;</li> <li>• information provided by third parties (such as your birth relatives) who may have expressed a contact preference in relation to you;</li> <li>• information in relation to whether an information session was held with an adopted person or other relevant person (which will either be notified to us by one of our employees or by Tusla);</li> <li>• information which the Minister for Children, Disability and Equality may require us by regulation to record on the CPR.</li> </ul>	(a) To comply with our legal obligations under BITA 2022, in particular Part 6; (b) For substantial public interest reasons and for the performance of a task carried out in the public interest and/or in the exercise of our official authority under Article 6(1)(e) and Article 9(2)(g) of the GDPR and s.66 of BITA 2022.

**Relevant Persons, Qualifying Persons, or Qualifying Relatives applying for Birth Certificates, Birth information (including Early Life, Care and Medical information) and provided items relating to a parent or relevant relative**

Purpose/Activity	Type of Personal Data	Lawful basis of processing
To maintain and improve the technical operation of the CPR, including by transferring personal data to technical third-party service providers (such as IT service providers).	All personal data recorded on the CPR which are processed incidentally in order to maintain and improve the technical operation of the CPR	<p>(a) To comply with our legal obligations under BITA 2022, in particular Part 6;</p> <p>(b) For substantial public interest reasons and for the performance of a task carried out in the public interest and/or in the exercise of our official authority under Article 6(1)(e) and Article 9(2)(g) of the GDPR and s.66 of BITA 2022.</p>

**Individuals (1) seeking mediation arising from matches on the CPR and/or (2) applying for tracing services**

To check the CPR for any matches; to communicate matches to relevant parties; to share information and items with relevant parties; and to facilitate communications between relevant parties.	<p>The personal data processed will depend on whether the Adoption Authority is facilitating a meeting between two persons who have 'matched' on the CPR, or facilitating the sharing of information. The data processed will routinely include:</p> <ul style="list-style-type: none"> <li>• personal details of the persons 'matched' on the CPR;</li> <li>• contact details of the persons 'matched' on the CPR;</li> <li>• information which one of the 'matched' parties wishes to share with the other</li> </ul> <p>The personal data processed may further include any further information, to the extent it has been recorded in the CPR, and is required for the purpose of facilitating a match.</p>	<p>(a) To comply with our legal obligations under BITA 2022, in particular s.40 of BITA 2022;</p> <p>(b) For substantial public interest reasons and for the performance of a task carried out in the public interest and/or in the exercise of our official authority under Article 6(1)(e) and Article 9(2)(g) of the GDPR and s.66 of BITA 2022.</p>
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**Relevant Persons, Qualifying Persons, or Qualifying Relatives applying for Birth Certificates, Birth information (including Early Life, Care and Medical information) and provided items relating to a parent or relevant relative**

<b>Purpose/Activity</b>	<b>Type of Personal Data</b>	<b>Lawful basis of processing</b>
The Adoption Authority may process personal data for the purposes of carrying out a tracing service. This may include using data in the CPR to facilitate contact with the person who requested the trace.	<p>The data which may be processed includes:</p> <ul style="list-style-type: none"> <li>Relevant contact details between the relevant matched individuals;</li> <li>information which person on the CPR / the requester wishes to share with the target(s) of the trace;</li> <li>information which the target of the trace wishes to share with individuals on CPR;</li> </ul>	<p>(a) To comply with our legal obligations under BITA 2022, in particular Part 5;</p> <p>(b) For substantial public interest reasons and for the performance of a task carried out in the public interest and/or in the exercise of our official authority under Article 6(1)(e) and Article 9(2)(g) of the GDPR and s.66 of BITA 2022.</p>
<b>Other Situations</b>		
For the purpose of responding to freedom of information requests; data protection requests; a binding request from a public authority or court.	The categories of personal data relevant to the request, or as specified in court order.	To comply with our legal obligations, including the Freedom of Information Act 2014 (as amended).
For public interest reasons in the area of public health including protecting against serious cross-border threats to health.	Health data.	To comply with any legal or regulatory obligations and any public health requirements pursuant to Article 6(1)(c) and Article 9 (2)(b) GDPR and s. 8 of the Safety, Health and Welfare at Work Act 2005, and/or Article 9(2)(i) GDPR and s.53 Data Protection Act 2018
In specific cases to protect the vital interest of you or another person where you are physically or legally unable to give consent and when we are informed of important medical data that our Medical Officer feels you or another person needs to know.	This will depend on the specific circumstances which arise.	Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent under Article 6(1)(d) and Article 9(2)(c) of the GDPR.