

Mighty Communicators Limited Privacy Policy

The purpose of this policy

This is the privacy policy of Mighty Communicators Limited (Ltd.). Mighty Communicators Ltd. is a Speech and Language Therapy service for children, based in Dublin. Company registration number 793422. We respect your right to the protection of your data. The following document outlines the information gathering and dissemination practices for Mighty Communicators Ltd. To fully understand how and why we collect data and to understand your rights, we encourage you to read this privacy policy.

We reserve the right to modify this privacy policy at any time. Each time you sign up to a new service with us, you should review the privacy policy in the case of amendments.

Data Protection

Mighty Communicators Ltd fully respects your right to data protection and will not collect any personal information about you without your clear knowledge and permission. Any personal information which you provide us will be treated strictly in accordance with the General Data Protection Regulation (GDPR), and the Data Protection Acts 1988-2018. We do not require you to provide personal information unless you wish to avail of our services. Where data is submitted it will be used for the stated purpose and any reasonably incidental purposes only.

To communicate with you via the internet and sending information to you by other means (e.g. email, messages) necessarily involves your personal information passing through or being handled by third parties (e.g. Microsoft Outlook). We do not sell or distribute your personal information to third parties for purposes of marketing.

Personal Data we collect

Mighty Communicators Ltd. holds personal data as part of conducting a professional service.

Difficulties with speech, language and communication can be complex, and a wide range of information may be collected to best meet the needs of the client, and to maintain a high-quality service which meets best practice requirements set out by our regulatory body CORU. The following information may be required:

Healthcare records	Client/family contact details: Name, address, phone numbers, e-mail address Personal details: date of birth Other contacts: name and contact details of GP and any other relevant healthcare professionals involved Parent/guardian details Description of family Pre- and post-natal history, this can include information relating to mother's pregnancy, and child's birth. Developmental data: developmental milestones, feeding history,
---------------------------	---

	<p>audiology history.</p> <p>Medical details: such as any relevant illnesses, medications, and relevant family history.</p> <p>Reports from other relevant allied health professionals such as: Audiology, Psychology, CAMHS (Child & Adolescent Mental Health Services), Occupational therapy, Physiotherapy, Ophthalmology.</p>
Educational records	Educational placement; Relevant information relating to student's support plan in school; progress notice from educational staff and school reports may be held.
Clinical records	Specific data in relation to communication skills may be collected and held, such as assessment forms, reports, case notes, e-mails, text messages and transcripts of phone. Audio and video files may also be collected and stored
General administrative records	Information regarding attendance reports and accident report forms.
Financial records	This pertains to all financial information concerning the service, e.g. invoices, receipts, information for Revenue. Mighty Communicators Ltd. may hold data in relation to on-line purchasing history, card payments, bank details, receipts and invoices. Information will include name of bill payer, client name, address and record of invoices and payments made.

Below provides examples of the type of information that we may require from you on different occasions to provide you with our services:

1. At the time of booking an appointment/ during initial phone call, we will collect the following data:
 - Client (child's) name & parent/guardian's name
 - parent/guardian's email address
 - parent/guardian's phone number
 - Client (child's) Date of Birth
 - Payment details, processed via Revolut
 - Home address

We collect the above information in order to identify who we are providing our service to; for billing, issuing invoices and receipts that can be used to claim with your health insurance (if applicable to you); to contact you in relation to agreed appointments/ support; to ensure age appropriate assessments are used to inform accurate diagnosis of speech, language and communication needs; to facilitate payment; and any additional reasonably incidental purposes only.

2. In addition to the above, the following information may be requested if you choose to complete an assessment or intervention.

- Developmental milestones
- Information on other professionals involved in your child's care/ support
- Birth and medical history, including any complications or medical diagnosis
- Educational status of child
- Family history of communication or other developmental difficulties
- Family background, e.g. siblings, preferred language

This information is required to enable us to fully determine the extent of your child's speech, language and communication needs and to decide the most appropriate form of intervention and to determine whether any onward referrals to other professionals are indicated.

3. Video consultation/ support

- Video consultation or support will be conducted via Microsoft Teams. Once an appointment date and time has been agreed, you will receive an email with the Meeting ID and password for the upcoming session.
- We employ the maximum-security features which Microsoft Teams has to offer to ensure the privacy, security and protection of our clients.
- You can familiarise yourself with Microsoft's Privacy Statement <https://www.microsoft.com/en-us/privacy/privacystatement>
- If you are unhappy with any of the terms of Microsoft Team's privacy statement, then please discuss this with us and we can consider an alternative communication method, such as phone call or face-to-face support, depending on your location.

4. Online Payment

Payments are processed via Revolut. To process payments and issue invoices, the following information will be required

- Client (child's) name & parent/guardian's name
- parent/guardian's email address
- parent/guardian's phone number
- Company name and Invoice details (where applicable)
- Payment details
- Home address/ billing address

How we gather your data

Mighty Communicators Ltd. will only collect the least amount of personal data that is required to provide you with a high-quality service.

Personal data will be provided by the client, or in the case of a child (under 16 years), their parent(s)/guardian(s). This information will be collected as part of a case history form prior to, or on the date of first contact. Further information may be collected over the course of assessment and intervention.

Information may also be provided directly from relevant third parties such as schools, medical professionals and allied health professionals, with prior consent from the parent(s)/guardian(s).

How we obtain your consent

Please note that we will request your lawful consent before we store any of your information.

A consent form will be attached onto any initial bookings via our on-line system Cliniko. Service users will be directed to read the privacy statement and to tick to agree to the terms. Services cannot be initiated without your consent to the details set out in our privacy policy.

Should a client wish to withdraw their consent for data to be processed, they can do so by contacting sarah@mightycommunicators.ie.

Your rights

To process your data, we rely on your consent. You have the right to withdraw your consent at any time. For processing activities which are based on a statutory or contractual requirement, you may request for your data to not be processed for that purpose. However, this is not an absolute right and may be over-ridden by our statutory obligations.

If you request that you do not want specific personal data to be processed for a particular purpose, then this may prevent us from executing a contract or delivering a service to you.

You have the right to

- *opt out from receiving any marketing related emails/ texts from our company (Right to object)*
- *request a copy of personal data that we hold about you (Right to Access). If requested, this information must be provided to you in an easy-to-read format and easily transferred to you (Right to portability)*
- *request for any error in data that we hold about you to be corrected (Right to Rectification)*
- *request that the data we hold about you be erased or removed from our records (Right to Erasure or Right to Be Forgotten), unless we have a countervailing interest or legal obligation to retain it.*
- *request that we refrain from processing data for a specific purpose (Right to Restrict processing)*

How can you access your personal data

If you wish to request your data in part or in full then we will supply this to you within 30 calendar days of the receipt of a valid request in writing. Please send all requests in writing via email to sarah@mightycommunicators.ie

We reserve the right to request you to provide additional information to enable us to identify your personal data and/or to verify your identity before releasing any data.

Where we store your personal data

We store your personal data on Cliniko <https://www.cliniko.com/>. This is the software that we use to manage appointments, maintain client records and issue invoices. Please see Cliniko's privacy policy here <https://www.cliniko.com/policies/privacy/>

You can read more about Cliniko's maximum-security here <https://www.cliniko.com/security/>

Cliniko stores European data in Ireland. Cliniko meets or exceeds all regulations of General Data Protection Regulation (GDPR).

The length of time your personal data is stored

We store your personal data for a range of periods depending on the type of data and the purpose that it was collected. We retain your information based on our legal obligations under GDPR, Revenue and best practice advised by our regulatory body CORU. For any questions relating to this, then please direct them to sarah@mightycommunicators.ie We will not keep your personal data for longer than is necessary.

Clinical Records: Mighty Communicators Ltd. Keeps electronic records of clinical data stored on Cliniko. Clinical data is deleted/confidentially destroyed after 2 years from last invoiced session. Video records/ voice recordings relating to client care/videoconferencing records may be recorded with consent, analysed and then destroyed immediately.

Financial Records: Mighty Communicators Ltd. keeps electronic records of financial data from those who use our services. The Irish Revenue requires that businesses must keep all records for **six years** after the end of the tax year to which the records refer. Financial Data is kept for a minimum of 6 years to adhere to Revenue guidelines. Financial Data (including non-payment of bills) can be given to Revenue at Revenue's request. Contact Data is kept for 6 years to allow processing of Financial Data if required. (This may be retained for longer for safety, legal request, or child protection reasons.)

Exceptions to the above: If under investigation or if litigation is likely, files must be held in original form indefinitely, otherwise files are held for the minimum periods set out above.

How your personal data may be shared

We do not share your personal data with third parties, other than as set out in this policy.

We may need to share personal information with our Service Providers, to provide our services to you. If necessary, we may also share personal information with our legal advisors. All our service providers are obliged to keep your personal information safe and secure under the requirements of GDPR. Our service providers include: Cliniko (record keeping); Revolut (finance); Microsoft Teams (intervention); Microsoft Office and Outlook (communication, resource development, report writing); Whats App Business (communication).

We will always seek your consent prior to disclosing information relating to your assessment or intervention with another professional, e.g. teacher, HSE.

Please note the limits of confidentiality, there are circumstances in which disclosure of confidential information in the absence of consent may be appropriate, justifiable and/or required by law. For

example, to prevent harm to the service user or a third party, to prevent harm to the public at large, or to comply with a legal requirement. For example, we may provide personal information where ordered by a court or to defend our legal rights or the safety of any person, or to meet the requirements of the Children First Act 2015.

Mighty Communicators Ltd is also required to share financial data with our accountant K+A Accountants to comply with local tax laws

Governing Law and Jurisdiction

This legal policy is governed exclusively by Irish law and is subject to the exclusive jurisdiction of the Irish courts.

Please note

Mighty Communicators takes our security responsibilities seriously and we employ the most appropriate measures to protect your data.

If any part of this Privacy Policy is held to be invalid or unenforceable, the validity or enforceability of the remainder will not be affected.

Delay or failure on our part in enforcing any of our rights shall not constitute a waiver by us of our rights and remedies.

Contact us

If you have any questions about this policy, please email sarah@mightycommunicators.ie

Review of this policy

We may revise this policy as required. This version is dated 1st September 2025.

Thank you for taking the time to familiarise yourself with our privacy policy.

Signed: 

Sarah O'Mahoney-Sharman, Company Director; Senior Speech and Language Therapist CORU SL018028