**Privacy Notice**

**1.**   **Introduction**

We are <<insert your business name>>. We’re a company registered in the Republic of Ireland with company number <<insert registered number>> , whose registered address is at <<insert registered address>>. In this privacy notice, we will refer to ourselves as ‘**we**’, ‘**us**’ or ‘**our**’. As explained in this notice, we are the Data Controller of the personal information we collect, hold and use about you.

You can get hold of us in any of the following ways:

1. by phoning us on <<insert telephone number>>;
2. by emailing us at <<insert email address>>; or
3. by writing to us at <<insert address>>.

We take the privacy, including the security, of personal information we hold about you seriously. This privacy notice is designed to inform you about how we collect and use your personal information. You should read this privacy notice carefully so that you know and can understand why and how we use the personal information we collect and hold about you.

**[**We have appointed NAME as our data protection officer. You can contact them using the details set out above**]**.

**OR**

**[**We do not have a data protection officer, but if you have any questions about this privacy notice or issues arising from it, you should contact NAME, who is responsible for matters relating to data protection at our organisation, including any matters in this privacy notice. You can contact them using the details set out above**]**.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at <<insert email address>>.

**2.**  **Details Of Personal Data That We Collect**

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data about you:

* **Identity information** that relates to your identity such as your name (including any previous names and any titles that you use), gender, marital status and date of birth.
* **Contact information** that relates to your contact details such as email address, addresses and telephone numbers
* **[Payment information** relating to the methods by which you provide payment to us such as [bank account details, credit or debit card details] and details of any payments (including amounts and dates) that are made between us.**] [Delete this paragraph if not applicable]**
* **Transaction information** related to transactions between us such as details of the goods, services and/or digital content provided to you and any returns details.
* **Marketing information** that relates to your marketing and communications preferences.
* **Technical information** that includes data about your use of our website and technical data which we collect (including your IP address, the type of browser you are using and the version, the operating system you are using, details about the time zone and location settings on the device and other information we receive about your device)

**Sensitive Data**

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

**[If you do not collect sensitive data, delete the above and insert the following:**

We need to collect the following sensitive data about you in order to **[deliver the services/product or insert the reason for processing]:**

**<<Insert sensitive data required>>**

We require your explicit consent for processing sensitive data, so when you submit your details, we will send you a further communication asking for you to confirm your consent to this processing.**]**

Where we are required to collect personal data by law or under the terms of the contract between us, and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don’t provide us with the requested data, we may have to cancel a product or service you have ordered, but if we do, we will notify you at that time.

We will only use your personal data for the purpose it was collected for or a reasonably compatible purpose if necessary. In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent, where this is required or permitted by law.

We do not carry out automated decision-making or any type of automated profiling.

**3.**  **Details of How and Why We Use Personal Data**

We can only use your personal information for certain legal reasons set out in data protection law. There are legal reasons under data protection law other than those listed below, but in most cases, we will use your personal information for the following legal reasons:

* **Contract Reason:** this is in order to perform our obligations to you under a contract we have entered into with you;
* **Legitimate Interests Reason**: this is where the use of your personal information is necessary for our (or a third party’s) legitimate interests, so long as that legitimate interest does not override your fundamental rights, freedoms or interests;
* **Legal Obligation Reason**: this is where we have to use your personal information in order to perform a legal obligation by which we are bound; and
* **Consent Reason**: this is where you have given us your consent to use your personal information for a specific reason or specific

We may collect data about you by you providing the data directly to us (for example, by filling in forms on our site or by sending us emails). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our cookie policy for more details about this <<Insert link to Cookie Policy>>.

Where we rely on consent for a specific purpose as the legal reason for processing your personal information, you have the right under data protection law to withdraw your consent at any time. If you do wish to withdraw your consent, please contact us using the details set out at the beginning of this notice. If we receive a request from you withdrawing your consent to a specific purpose, we will stop processing your personal information for that purpose, unless we have another legal reason for processing your personal information – in which case, we will confirm that reason to you.

Sometimes we may anonymise personal information so that you can no longer be identified from it and use this for our own purposes. In addition, sometimes we may use some of your personal information together with other people’s personal information to give us statistical information for our own purposes. Because this is grouped together with other personal information, and you are not identifiable from that combined data we are able to use this.

Under data protection laws, we can only use your personal information for the purposes we have told you about, unless we consider that the new purpose is compatible with the purpose(s) we told you about. If we want to use your personal information for a different purpose that we do not think is compatible with the purpose(s) we told you about, then we will contact you to explain this, and what legal reason is in place to allow us to do this.

1. **Details About Whom Personal Data May Be Shared**

We may need to share your personal information with other organisations or people. These organisations include:

* Other companies in our group who provide services to us. **[Delete if not applicable]**
* Service providers who provide IT and system administration services.
* Professional advisers, including lawyers, bankers, auditors and insurers
* Government bodies require us to report processing activities.
* **[Insert details of any other third parties, for example fraud prevention agencies, market researchers, universities etc].**
* Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

**5.**  **Transfers To Countries Outside The EEA**

**[**We do not transfer your personal information outside of the EEA.**[**

**OR**

**[**If any transfer of personal information by us will mean that your personal information is transferred outside of the EEA, then we will ensure that safeguards are in place to ensure that a similar degree of protection is given to your personal information as is given to it within the EEA and that the transfer is made in compliance with data protection laws (including, where relevant, any exceptions to the general rules on transferring personal information outside of the EEA that are available to us – these are known as ‘derogations’ under the data protection legislation). We may need to transfer personal information outside of the EEA to other organisations within our group or to the third parties listed above in section 4 who may be located outside of the EEA.**]**

**6.**  **Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data, we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances, we may anonymise your personal data for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

**7.**  **Your Legal Rights**

Under data protection laws, you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:

<https://www.dataprotection.ie/en/individuals/rights-individuals-under-general-data-protection-regulation>

If you wish to exercise any of the rights set out above, please email us at <<insert email address>>

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Data Protection Commissioner’s Office (DPC), the Irish supervisory authority for data protection issues ([www.dataprotection.ie](http://www.dataprotection.ie)). We would be grateful if you would contact us first if you have a complaint so that we can try to resolve it for you.