

PRIVACY NOTICE

1. WHAT PERSONAL DATA DO WE COLLECT?

To discharge its functions and provide a service to its member organisations ICOS collects certain types of information on individuals. To the extent that this information identifies, or is capable of identifying, an individual it constitutes “personal data”. Please take note of the following categories of personal data which ICOS may, from time to time, have cause to collect:

- 1.1 Name, occupation, job title (for instance as an executive, employee or director of one of our member organisations)
- 1.2 Contact details including home address, business address, telephone number, email address, social media addresses/ identifiers (e.g. twitter handle for member events and conferences)
- 1.3 Financial details such as bank/pension account numbers and reference numbers, credit/debit card details (for instance of committee members for verification and discharge of expense reimbursements) and PPS numbers (for instance to comply with Revenue requirements relating to member pension schemes)
- 1.4 Date of birth, educational awards and training qualifications (for instance of directors of member organisations so as to appropriately determine eligibility for positions on committees and expert groups) Government issued identification (e.g. passports), other identification instruments and utility bills (for instance for anti-money laundering and travel bookings)
- 1.5 Medical records (for instance for administration of member pension scheme)
- 1.6 Records of invitations and briefings sent to you and of your attendance at ICOS events, including photographs taken of you at these events
- 1.7 The name of your spouse or partner (in limited circumstances)

2. WHAT IS THE PURPOSE FOR PROCESSING THIS DATA AND ON WHAT LEGAL BASES?

Your personal data is used by us and by third party service providers acting on our behalf for the following purposes:

- 2.1 Providing advice and services relating to Irish Industrial and Provident Societies (“Co-operatives”)
- 2.2 For administrative and billing purposes and for other purposes incidental to the services ICOS provides
- 2.3 Assisting you and/or your organisation in dealing with the Registry of Friendly Societies, other regulatory/ governmental bodies and other industry groups
- 2.4 To ensure that content from our websites is presented in the most effective manner for you
- 2.5 To allow you to participate in interactive features of our websites including services provided by our affiliated companies including companies that, directly or indirectly control us; or are controlled by us; or are under common control with us, when you choose to do so
- 2.6 Keeping you apprised of legislative, regulatory and commercial developments relating to co-operatives and invitations to events, our general meetings and Skillnet training courses
- 2.7 Maintaining our list of contacts
- 2.8 Performing analysis and research in relation to transactions, including without limitation, analysing and conducting research on our affiliates
- 2.9 To notify you about changes to our service

The legal bases on which we collect, process and transfer your information in the manner described above are:

For 2.1 - 2.5

- Your consent (where we have sought it and you have provided it to us), and in which case, you can withdraw your consent at any time
- Where any such processing is necessary for the performance of a contract with us
- Our legitimate interests in conducting our business in a responsible and commercially prudent manner
- For compliance with legal obligations to which we may be subject from time to time

For 2.6 – 2.9

- Our legitimate interest in maintaining a business relationship and communicating with you, as a business contact, about our events and providing you with information about new developments in the co-operative and agricultural sectors

3. WHAT ARE THE SOURCES FOR THIS DATA?

As well as collecting information from you or the co-operative that you are a member/employee of, in some cases your personal data has been supplemented by information obtained from publicly available sources, including LinkedIn, the Registry of Friendly Societies and your co-operative's website, for the purpose of confirming your current position within the co-operative.

4. WHEN DO WE SHARE YOUR DATA?

We may share your personal data with selected third-party recipients where there is a legitimate and relevant justification for doing so.

To further the interests of our affiliates and by extension their producer members ICOS maintains business relationships with third party organisations such as trade bodies, representative associations, financial institutions and information technology service providers. In order to ensure to serve our affiliates and further their interests we may, where appropriate, share your personal data with these third parties. When we do so we will make enquiries regarding the privacy protections in place within such organisations.

In addition, we may disclose your personal data with governmental and state agencies whether to comply with the conditions of ICOS's involvement with such bodies. We may also disclose your personal data where compelled to do so by a court of law, to co-operate with law enforcement agencies or where acting in good faith we form the view that to so disclose would expose our organisations, and by extension, its members to liability.

We may occasionally transfer personal data outside the EEA but will not do so without your permission nor without appropriate assurances on the adequacy of data privacy protection commitments.

5. HOW LONG DO WE RETAIN PERSONAL DATA?

We will retain your personal data for as long as it is reasonably necessary for us to provide you/your co-operative with our services and to comply with relevant regulatory and legal obligations. If you are a business contact, we will retain your personal data for as long as we consider you to be a business contact and we will give you the opportunity to unsubscribe if you no longer wish to receive communications and invitations from us. We may keep an anonymised form of your personal data, which will no longer refer to you, for statistical purposes to the extent that we have a legitimate and lawful interest in doing so.

6. HOW IS YOUR PERSONAL DATA KEPT SAFE AND SECURE?

We employ physical, electronic and managerial measures to ensure that we keep your personal data secure, accurate and up to date.

These measures include technology features such as fire walls, machine encryption and anti-virus software. Managerial practises include access restriction controls ensuring that the processing of personal data is carried out in a manner that minimises risk to the rights of the subject.

Please note that although we employ security measures geared to keep your personal data safe and secure the transmission of data over the internet, whether via email or a web platform, can never be assumed to be completely secure. While ICOS endeavours to protect personal data, we cannot guarantee the security of data transmitted to us or by us.

7. WHAT HAPPENS IF DATA IS RECALLED BY YOU AS DATA SUBJECT?

You are not under a statutory or contractual duty to provide us with any personal data. However, there are some pieces of information that you must provide to us so that we can provide you with our services. We will notify you of any such required information.

If you do not provide us with your information for the purposes described above, we cannot send you newsletters, respond to your queries sent through our contact us form, liaise with you/your co-operative on affiliate matters or assess your suitability for a role within ICOS.

8. IS DATA TRANSFERRED ABROAD?

We transfer data required to carry out any work being done on your/your Co-operative's behalf that is necessary to take place outside of Ireland. This data is secured by the same technology features and managerial practices as data kept by ICOS in Ireland.

9. WHAT RIGHTS DO YOU HAVE TO YOUR DATA?

Under the GDPR you have the right to:

- a) be informed about the personal data we hold relating to you
- b) have access to that personal data
- c) rectification of inaccurate/incomplete personal data
- d) erasure
- e) restrict processing
- f) data portability
- g) object to any processing of personal data
- h) rights in relation to automated decision making and profiling

Each of these rights are supported by appropriate procedures within ICOS that allow the required action be taken within the timescale stated by GDPR.

10. HOW DO YOU MAKE A COMPLAINT?

If you are unhappy with how we process personal data, we ask you to contact us on the below contact details so that we can rectify the situation: info@icos.ie

You may lodge a complaint with a supervisory authority. The Irish supervisory authority is the Data Protection Commission and they may be contacted via the below link:

<https://dataprotection.ie/docs/Raise-a-Concern/1716.htm>