

# ICOS Privacy Notice

April 2024

## Who we are.

- The Irish Co-operative Organisation Society (“ICOS”) is a representative organisation for the co-operative sector in Ireland. Established as an industrial and provident society its registered office and principal place of business is at The Plunkett House, 84 Merrion Square, Dublin 2, Ireland.

## What this notice means.

- ICOS takes its responsibilities under applicable data protection law, including the General Data Protection Regulation (EU) 2016/679 and implementing legislation (“Data Protection Law”) very seriously.
- The purpose of this notice is to inform you of the data relating to you that we may collect and use and the uses (including disclosures to third parties) we may make of your data, which includes the provision of advisory, representative, educational and informational services.

## What data do we collect.

- ICOS is the controller in respect of the data we collect and we take all reasonable steps to ensure the safety and privacy of all such information.
- We collect personal data that you voluntarily provide to us, for example when you communicate with us via email, when you sign up for or ask us to send you newsletters, briefings, or other materials and when you sign up for an event. Such data may include:
  - ❖ your name, job title and name of employer and any personal data you send to us to provide you with legal services;
  - ❖ your contact details, including your home address (where you have provided this to us), business address, email address and telephone number;
  - ❖ records of invitations and briefings sent to you and of your attendance at ICOS events;
  - ❖ information relating to particular ICOS services or events that you may have engaged with or participated on or which may be of interest to you.
- If we are in regular contact with you we may collect more information about or related to our relationship with you. For example, if you are a member of one of the ICOS expert committees.
- We may also receive personal data about you from third party sources including semi state bodies (such as Bord Bia or Teagasc), government (such as the Department of Agriculture, Food and the Marine) of a co-operative society of which you are a member (for example in the context of any positions you might hold in that co-operative or events you might attend on its behalf).

### **What we do with the data we collect.**

- Any personal data we collect is used by us and by third party service providers acting on our behalf for the following purposes:
  - ❖ providing advice and services relating to co-operatives;
  - ❖ for administrative and billing purposes and for other purposes incidental to the services ICOS provides;
  - ❖ keeping you apprised of legislative, regulatory, economic and operational developments relevant to co-operatives, their members, representatives and management including circulars on legal developments, invitations to information and collaboration events (including our Annual General Meeting) and ICOS Skillnet training programmes;
  - ❖ maintaining our list of contacts.
  - ❖ performing analysis and research in relation to developments, including without limitation, analysis of and the conduct of research on co-operatives affiliated to ICOS.
  - ❖ To notify you about changes to our services.
  - ❖ Assisting you in dealing with the Registry of Friendly Societies and other regulatory and government bodies.
  - ❖ To ensure that content from our websites is presented in the most effective manner for you and your organisation.
  - ❖ To allow you to participate in interactive features of our websites.
  
- The legal bases on which we collect, process and transfer your data in the manner described above are:
  - ❖ 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; and
  - ❖ our legitimate interests in conducting our business in a responsible and commercially prudent manner and 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.
  - ❖ For compliance with legal obligations to which we may be subject from time to time.
  
- We employ appropriate technical and organisational security measures to help protect your personal data against loss and to guard against access by unauthorised persons.

### **Retention of data.**

- ICOS will retain your data for the duration required to fulfil the purposes outlined in this Notice.

### **Sharing of data.**

- We may disclose your personal data to third party recipients acting on your or our behalf, for the purposes of providing services to you and/or your co-operative society and for providing you with information which we believe you may be interested in.
- Please note that in addition we may disclose your personal data if we are under a duty to disclose or share your personal data to comply with any legal obligation or to protect the rights, property, or safety of ICOS, our affiliated member co-operatives, or others.
- Please note that we may use and process your personal data without your knowledge or consent, in compliance with the above section (What we do with your data), where this is required or permitted by law.

### **Transfers of data.**

- Where relevant and necessary to do so we may transfer your personal data outside the European Economic Area, including to a jurisdiction which is not recognised by the European Commission as providing for an equivalent level of protection for personal data as is provided for in the European Union.
- If and to the extent that we do so, it is our policy to ensure that appropriate measures are in place to comply with obligations under applicable law governing such transfers, which may include putting in place an appropriate transfer agreement such as one that incorporates the European Union's standard contractual clauses.

### **Your rights.**

- You have the certain rights, in certain circumstances and subject to certain restrictions, in relation to your personal data. These are as follows:
  - ❖ the right to be provided with a copy of your personal data;
  - ❖ the right to request the rectification and/or erasure of your personal data;
  - ❖ the right to restrict the use of your personal data;
  - ❖ the right to object to the processing of your personal data, where we are processing it based on this being necessary for the purposes of our or of a third party's, legitimate interests; and
  - ❖ the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format or to require us to transmit that data to another controller, where we are processing the data based on your consent or that this is necessary for the performance of a contract with you.

- To exercise any of the rights set out above, or if you have any questions about how we process your personal data, you can contact us by:
  - ❖ email at [info@icos.ie](mailto:info@icos.ie) ; or
  - ❖ writing to us at The Plunkett House, 84 Merrion Square, Dublin 2, Ireland.
- We are required to keep all personal data accurate and up to date. To assist us in doing so, we ask you to contact your usual contact at ICOS or email [info@icos.ie](mailto:info@icos.ie) with any relevant changes, such as change of address or contact telephone numbers.
- You also have the right to lodge a complaint with the Data Protection Commission. For further information, see [www.dataprotection.ie](http://www.dataprotection.ie)

**--ENDS--**