

IE-ITwww02

Website privacy notice

Privacy Notice

This is the privacy notice of [trading or business or organisation or company name][], registered number [number]. (' [REDACTED] , ' [REDACTED] , [REDACTED] ' [REDACTED]).

Our registered office is at [address].

Introduction

In the context of the law and this notice, 'personal data' is information that clearly identifies you as an individual or which could be used to identify you if combined ■ ■

[View Details](#) | [Edit](#) | [Delete](#)

Data Protection Officer

We have appointed a data protection officer ('DPO') who is responsible for [REDACTED].

If you have any questions about how we process your personal data, including any requests to exercise your legal rights, please contact our DPO, [REDACTED].

Personal data we process

1. How we obtain personal data

The information we process about you includes information:

- you have directly provided to us

- that we gather from third party ██████████
- as a result of monitoring how you use ██████████
██████

2. Types of personal data we collect directly

When you use our website, our services or buy from us, [for example, when you create an account on our website,] we ask ██████████ ██████████ ██████████ :

- personal identifiers, such as your first and last names, ██████████ ██████████
- contact information, such as your email address, your telephone number and your ██████████, ██████████
██████
- account information, including your username and password
- payment information, such as a debit or credit card number ██████████
██
- records of communication between us including messages sent through our ██████████, ██████████
- marketing preferences that tell us what types of ██████████
████████████████████████

In addition, we may also process:

- documentation that confirms your identity, such as an image ██████████
██
- an image that shows your face, ██████████ ██████████ ██████████
- documentation that confirms the qualifications you advertise as holding
- documentation that confirms your employment, ██████████ ██████████
██████
- documentation that confirms your address, such as ██████████
██

3. Types of personal data we collect from third parties

By using our website and our :

- transaction information that includes the details of the products services you have bought from ██████████
██████████
- your preferences to receive marketing from us; how you wish to communicate with us; and responses ██████████
██████████.

5. Our use of aggregated information

We may aggregate anonymous information such as statistical or demographic data for any purpose. Anonymous information is that which does not identify you as an individual. Aggregated information may be derived from ██████████
██████████
██████████.

For example, we may aggregate usage information to assess whether a ██████████
██████████.

However, if we combine or connect aggregated information with your personal data so that it can identify you in any way, we treat the combined information ██████████, ██████████
██████████.

6. Special personal data

Special personal data is data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, ██████████
██████████, ██████████
██████████.

It also includes information about criminal ██████████.

We do not collect any special ██████████.

OR

We may collect special personal data about you if there is a ██████████
██████████.

7. If you do not provide personal data we need

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide ██████████
██████████.

In that case, we may have to stop providing a service to you. If so, ██████████
██████████.

The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal data, ██████████
██████████.

If a basis on which we process your personal data is no longer relevant ██████████
██████████.

If the basis changes then if required by law we shall notify you of the change and of any new basis under ██████████
██████████.

8. Information we process because we have ██████████ ██████████

When you create an account on our website, buy a product or service from us, or otherwise agree to our ██████████, ██████████
██████████.

In order to carry out our obligations under that contract we must process the information you give us. ██████████
██████████.

We may use it in order to:

- verify your identity for security purposes ██████████
██████████
- sell products to you
- provide you with our services
- provide you with suggestions and advice on products, services and how ██████████
██████████

We process this information on the basis there is a contract between us, or that you have requested we ██████████
██████████.

We shall continue to process this information until the contract between us ends or is terminated ██████████
██████████.

9. Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including [job opportunities and] ██████████
██████████, ██████████
██████████.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, we ask you to agree to ██████████
██████████.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected ██████████
██████████.

We continue to process your information on this basis until you withdraw your consent or it can ██████████
██████████.

You may withdraw your consent at any time by instructing us [at email address or webpage]. However, if you do so, ██████████
██████████.

We aim to obtain and keep your consent to process your information. However, while we take your consent into account in decisions about whether or not ██████████, ██████████
██████████.
██████████. ██████████, ██████████
██████████, ██████████, ██████████, ██████████, ██████████, ██████████, ██████████, ██████████.

10. Information we process for the purposes of legitimate interests

We may process information on the basis [REDACTED]
[REDACTED], [REDACTED], [REDACTED]

Where we process your information [REDACTED], [REDACTED]
[REDACTED]:

- whether the [REDACTED]
[REDACTED]
- whether processing ([REDACTED]) [REDACTED]
[REDACTED]
- whether you would expect us to process [REDACTED], [REDACTED]
[REDACTED], [REDACTED], [REDACTED]

For example, we [REDACTED]
[REDACTED]:

- improving our services
- record-keeping for [REDACTED]
[REDACTED]
- responding to unsolicited communication [REDACTED]
[REDACTED]
- preventing fraudulent use of our services
- exercising our legal rights, [REDACTED]
[REDACTED]
- insuring against or obtaining [REDACTED]
[REDACTED]
- protecting your interests [REDACTED]
[REDACTED]

11. Information we process because we have a legal obligation

Sometimes, we must ██████████
██████████.

For example, we may be required to give information ██████████
██████████
██████████.

This may include your personal data.

12. Information we process to protect vital interests

In situations where processing personal information is necessary to protect someone's life, ██████████
██████████, ██████████
██████████.

For example, we may ██████████
██████████.

How and when we process your personal data

13. Your personal data is not shared

We do not share or ██████████, ██████████
██████████.

14. Information you provide

Our website allows you to post information ██████████
██████████, ██████████, ██████████, ██████████
██████████.

For example, when you leave a review or post a message on our website, ██████████
██████████
██████████.
██████████, ██████████
██████████.

Other examples include:

- tagging an image
- clicking on an icon [REDACTED]
[REDACTED], [REDACTED]

In posting personal data, it is [REDACTED]
[REDACTED]
[REDACTED].

We do not specifically [REDACTED]
[REDACTED].

We do store it, and [REDACTED]
[REDACTED].

We provide you with a public profile page, the information on [REDACTED]
[REDACTED]
[REDACTED].

Once your information enters the public domain, we have [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].

Provided your request is reasonable and there is no legal basis for us to retain it, [REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED].

15. Payment information

First option

We store information about your debit [REDACTED]
[REDACTED]
[REDACTED].

We store this payment information [at your [REDACTED]] [REDACTED]
[REDACTED]
[REDACTED].

[We [REDACTED] .]

We take [REDACTED] :

- We keep [REDACTED].
- We do [REDACTED]
:
 - a) to prevent the possibility [REDACTED]
[REDACTED];
 - b) to prevent any [REDACTED]
[REDACTED]
- Access to your [REDACTED]
[REDACTED].
- If we ask you questions about your payment information, we only show [REDACTED]
[REDACTED]
[REDACTED],
[REDACTED].
- [Other...]

We automatically delete your payment [REDACTED] [REDACTED].

Second option

Payment information is never taken by us or [REDACTED]
[REDACTED]
[REDACTED].

At the point of payment, you are transferred to a secure page on the website of [REDACTED / [REDACTED] / [REDACTED] / [REDACTED] / [REDACTED]] [REDACTED]
[REDACTED]
[REDACTED],
[REDACTED].

16. Direct Debit information

When you agree to set up a Direct Debit arrangement, the information you [REDACTED]
[REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED / [REDACTED]] [REDACTED].

[We keep this [REDACTED].]

17. Job application and employment

If you send us information in connection with a job [REDACTED], [REDACTED]
[REDACTED] [REDACTED].

If we employ you, we collect information about you and your work from time to time throughout the [REDACTED].
[REDACTED]
[REDACTED], [REDACTED]
[REDACTED].

18. Information obtained from third parties

Although we do not disclose your personal data to any third party ([REDACTED]
[REDACTED]), [REDACTED]
[REDACTED].

No such information is personally identifiable to you.

19. Third party advertising on our website

Third parties may advertise on our website. In doing so, [REDACTED], [REDACTED]
[REDACTED]
[REDACTED].

They may also use other technology such [REDACTED]
[REDACTED], [REDACTED]
[REDACTED].

We do not have control over these technologies or [REDACTED]
[REDACTED]. [REDACTED], [REDACTED]
[REDACTED].

20. Credit reference

To assist in combating fraud, we share information with credit reference agencies, so far ██████████
███████████
███████████
███████████
███████████.

21. Disputes between users

In the event of a dispute between you and another █████, ██████████
███████████, ██████████, ██████████
███████████.

At our discretion, we may share ██████████
███████████
████.

22. Service providers and business partners

We may share your personal ██████████
███████████, ██████████.

As examples:

- we may pass your ██████████
███████████
- we may use fraud prevention agencies and credit reference ██████████
███████████
███████████
███████████
- we may pass your ██████████
███████████

23. Referral partners

This is information given to us ██████████
███████████.

It allows us to recognise visitors that you have referred to [REDACTED], [REDACTED]
[REDACTED], [REDACTED].
[REDACTED].

The information [REDACTED].

We undertake to preserve [REDACTED]
[REDACTED].

We expect any [REDACTED]
[REDACTED].

Use of information we collect through automated systems

24. Cookies

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].

[REDACTED]
[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED],
[REDACTED].

[REDACTED], [REDACTED], [REDACTED]; [REDACTED], [REDACTED], [REDACTED],
[REDACTED]; [REDACTED], [REDACTED], [REDACTED], [REDACTED].

[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED],
[REDACTED], [REDACTED] ([REDACTED]), [REDACTED], [REDACTED],
[REDACTED].

[REDACTED]
[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED],
[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED].

[REDACTED]

[REDACTED]

[REDACTED], [REDACTED]

[REDACTED], [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED], [REDACTED]

[REDACTED]

[REDACTED]

We use cookies in the following ways:

- to track how you use our website
 - [REDACTED]
[REDACTED]
 - to keep you signed in to our website
 - [REDACTED]
[REDACTED]
 - [REDACTED]
[REDACTED]
- [REDACTED].

25. Personal identifiers from your browsing activity

[REDACTED]

[REDACTED]

[REDACTED], [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED], [REDACTED]

[REDACTED]

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26. Re-marketing

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Other matters

27. Your rights

[REDACTED]

We do this now, by requesting that you read the information provided at
<http://www.knowyourprivacyrights.org>

28. Use of our services by children

[REDACTED]
[REDACTED], [REDACTED].

[REDACTED]
[REDACTED] [15] [REDACTED]. [REDACTED] [REDACTED]
[REDACTED].

[REDACTED] 18, [REDACTED]
[REDACTED].

[REDACTED]
[REDACTED], [REDACTED]
[REDACTED].

29. Encryption of data sent between us

[REDACTED] ([REDACTED])
[REDACTED]
[REDACTED].

[REDACTED], [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].

30. Delivery of services using third party communication software

[REDACTED], [REDACTED]
[REDACTED] ([REDACTED]), [REDACTED] ([REDACTED])
[REDACTED], [REDACTED] ([REDACTED]) [REDACTED] ([REDACTED]).

[REDACTED]
[REDACTED]
[REDACTED], [REDACTED], [REDACTED]
[REDACTED].
[REDACTED]
[REDACTED], [REDACTED].

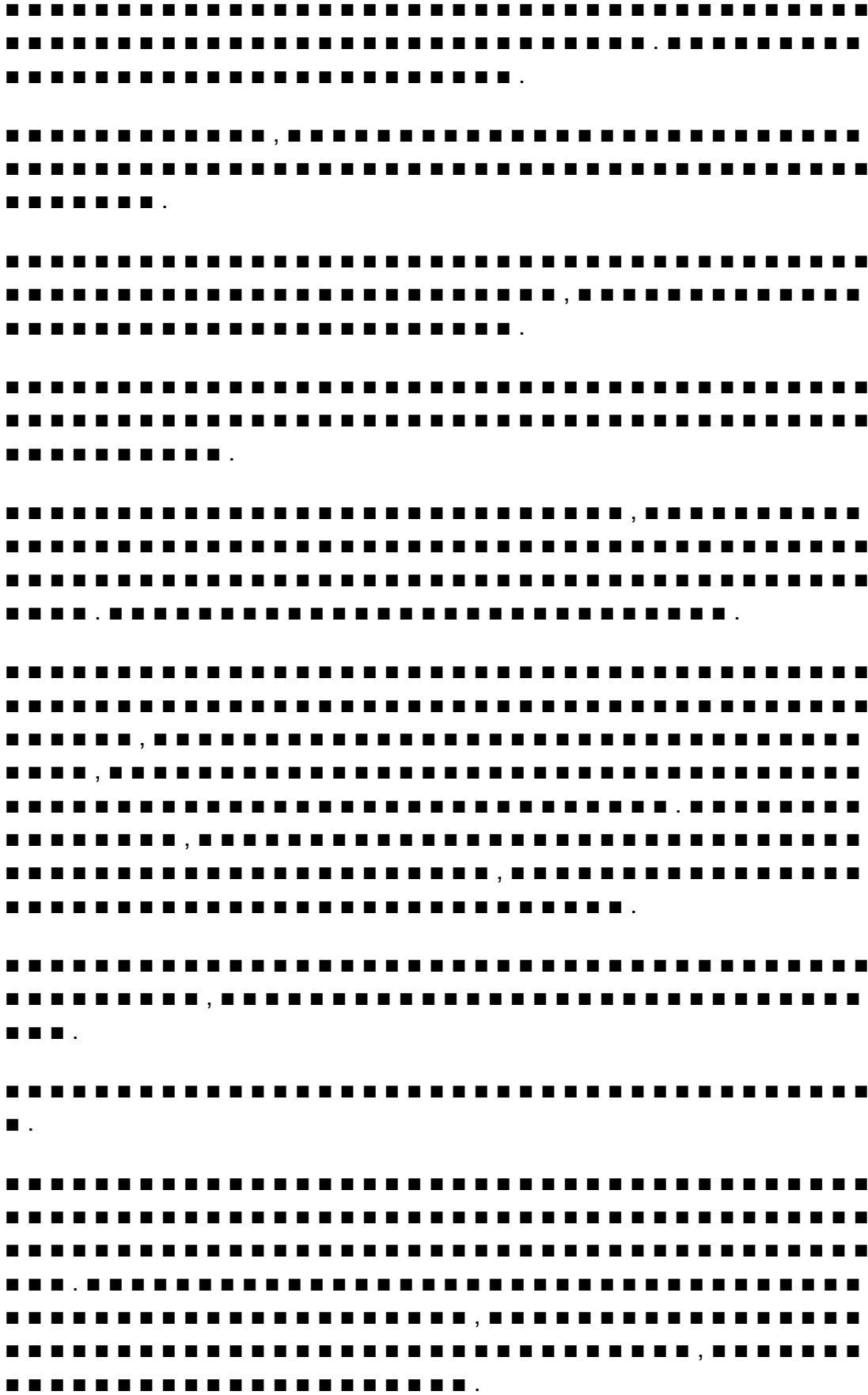
31. Data may be processed outside the European Union

Our websites are hosted in [\[country\]](#).

[REDACTED]
[REDACTED]
[REDACTED].
[REDACTED]
[REDACTED].
[REDACTED]
[REDACTED] :

- [REDACTED]
[REDACTED]
[REDACTED].

32. Control over your own information



33. Communicating with us

[REDACTED], [REDACTED], [REDACTED]
[REDACTED], [REDACTED], [REDACTED]
[REDACTED], [REDACTED], [REDACTED]
[REDACTED].

[REDACTED]
[REDACTED] [REDACTED / [REDACTED]].

[REDACTED]
[REDACTED], [REDACTED], [REDACTED].

OR

[REDACTED]
[REDACTED], [REDACTED], [REDACTED]
[REDACTED], [REDACTED], [REDACTED]
[REDACTED].

34. Complaining

[REDACTED], [REDACTED]
[REDACTED], [REDACTED], [REDACTED]
[REDACTED].

[REDACTED]
[REDACTED]

[REDACTED], [REDACTED]
[REDACTED], [REDACTED], [REDACTED]
[REDACTED].

[REDACTED]
[REDACTED], [REDACTED], [REDACTED]
[REDACTED], [REDACTED], [REDACTED]
[REDACTED], [REDACTED], [REDACTED]
[REDACTED].

[REDACTED]
[REDACTED], [REDACTED], [REDACTED]
[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED].

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If you are in any way dissatisfied about how we process your personal data, you have a right to lodge a complaint with the Data Protection Commission (DPC). This can be done at <https://www.dataprotection.ie/docs/complaints/1592.htm>. We would, however, appreciate the opportunity to talk to you about your concern before you approach the DPC.

35. Retention period

.....,.....
.....
.....:

- to provide you with the services you have requested
- ,
- to support a claim or defence in court

36. Compliance with the law

2018 (‘ ’) (‘ ’) (‘ ’) (‘ ’) 2011 .

37. Review of this privacy policy

We shall update this privacy notice from time to time as necessary.

Explanatory notes

Privacy policy notice

General notes

Compliance in Ireland

In Ireland, the rights and obligations regarding protection of an individual's personal data, in the EU Data Protection Directive (95/46/EC), implemented as the General Data Protection Regulation, or the GDPR, are written in the Data Protection Act 2018 (the 'DPA' or the 'Act'). In addition to the DPA, if you communicate by electronic messages, you [REDACTED] ([REDACTED] [REDACTED]) ([REDACTED] [REDACTED]) [REDACTED] 2011.

The requirements under the DPA are similar in extent to prior data protection law in Ireland. If your business complies with prior law, then the changes [REDACTED] [REDACTED].

The possible implications for non-compliance are now much more severe. In theory, the Data Protection Commission (DPC) has the power to fine [REDACTED] 4 % [REDACTED].

However, regarding selling to consumers we believe that the DPC in practice is unlikely to fine many small businesses and organisations without having first given a warning. Having a privacy notice (such as one based on this template) that shows some effort to comply with the law is likely, in [REDACTED], [REDACTED] [REDACTED].

Updating your website privacy notice is not the only requirement for compliance with the DPA or GDPR. You are also likely to need to change how customers and visitors can access personal data held about them, [REDACTED].

You may also need to update other legal documents, in particular, your [REDACTED].

Using this template as the basis for [REDACTED]

Your privacy policy should be concise (while also being comprehensive), transparent, easy [REDACTED].

You may think that a document stretching to 19 pages is not concise, but much of it can be ██████████.

We offer this template free as an example of a Net Lawman document. We hope that you like it, and that you may buy ██████████
██████████.

Regardless of the price, we assert our copyright in the document. Our standard licence terms apply. While you may not distribute the template without including our copyright, **you may remove our ██████████**
██████████.

Paragraph specific notes

Numbered notes refer to specific numbered paragraphs in ██████████.

Identification of the owner of the website

The Act requires that you identify the business or the organisation that operates the website. Using the domain name as the business name is technically not enough. You need ██████████
██████.

In practice, you may decide that you do not want to provide your name and address (for your own privacy reasons). You may be more likely to get away with doing this if you don't ██████████
██████████.

Introduction

The aim of the introduction is to explain the purpose of the document, the key terms ‘process’ and ‘personal data’ and the scope of the document (whether it applies to data just processed as ██████████
█ / ██████████).

Data Protection Officer

Unless your organisation processes large volumes of personal data, you are unlikely to be required to ██████████.

If you have nominated an individual, you may mention him or ██████████
██████.

Otherwise, you can delete this section.

Personal data we process

conditions) and ‘Consent’ (after the visitor has agreed to your use of his or her data – usually by taking some affirmative action such as clicking on a button). Some data may also [REDACTED] , [REDACTED]
[REDACTED].

All the bases are described at: <http://www.knowyourprivacyrights.org/legitimate-uses/>

The reasons why you process the data arise as a result of the basis. If there is a contract, there is a contractual obligation to [REDACTED] , [REDACTED]
[REDACTED].

You may want to edit these sections in minor [REDACTED] ([REDACTED]).

More importantly, you should make design changes to how your website works so as to [REDACTED], [REDACTED]
[REDACTED].

For most websites, Contract is the strongest basis for processing. If you can design your website experience such that a visitor agrees to your terms early on, before providing personal data, you will have fewer grounds for complaints. For example, you might reduce the requirement to provide detailed information when a [REDACTED]

[REDACTED], [REDACTED]
[REDACTED].
, [REDACTED]
[REDACTED].

If you are relying on consent, then you might design a banner to appear when a visitor [REDACTED] ([REDACTED] , [REDACTED]
[REDACTED]).

Positive action needs to be taken by the visitor when agreeing to anything – [REDACTED]
[REDACTED].

Legitimate Interests is a basis that is fairly subjective. For it to be used, you must have decided that there is a legitimate interest, that processing the data is necessary to protect that interest, and that the data subject’s interests (or other interests) do not override [REDACTED] . [REDACTED] , [REDACTED]
[REDACTED] , [REDACTED]
[REDACTED].
[REDACTED].
[REDACTED].

.....
.....

For example, you might sell fruit from your website. A visitor visits a page about the health benefits of ,

The advertising service provider usually allows you , , , , , ..

Some people feel very strongly about re- “ ”,

You can choose to delete this paragraph entirely , , ,

Other matters

27 Your rights

A key requirement of the law is that you tell your visitors , , , , ,

28 Use of our services by children

Under Irish law, you cannot form a contract with a child. , , , , ,

So it is ,

Additionally, personal data about children ██████████
██████████ . ██████████
██████████ .

Unless the likelihood of visitors under the ██████████ 18 ██████████
██████████ , ██████████
██████████ .

29 Encryption of data sent between us

This section is included ██████████
██████████ .

30

This section is only relevant if ██████████
██████████ . ██████████
██████████ , ██████████ .

31

It is a legal requirement to tell the ██████████
██████████ .
██████████ .
██████████ .
████ .

If you want to be as compliant as possible, ██████████
██████████ . ██████████ . ██████████
██████████ , ██████████ , ██████████ - ██████████
██████████ .

In practice, it might be very difficult ██████████
██████████ , ██████████
██████████ , ██████████ .

The clause giving examples (██████████) ██████████
██████████ .

The safeguards (bullet points at the end ██████████) ██████████
████ , ██████████
██████████ (██████████ , ██████████) ██████████ .

For most organisations, ██████████
██████████ .

32 Control over your own information

Under the Act, a data subject has a
.....,
.....
.....

You should ,

33 Communicating with us

Communication requires a transfer
.....

34 Complaining

This paragraph sets
.....

It gives you a stronger
.....,
.....

In any case, you
.....,
.....

35 Retention period for personal data

It is a requirement of the Act to
.....
.....

Basic Irish law relating to limitation for bringing a , ,
.....
.....
.....

36 Compliance with the law

Leave this paragraph in place.

37 Review of this privacy policy

Leave this paragraph in place.

End of notes