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DATA PROTECTION AND PRIVACY POLICY

The purpose of our Privacy Policy is to outline how we deal with any personal data you provide to us while visiting our website and throughout the course of various interactions pre, post and during your membership with Cork Chamber of Commerce. Cork Chamber of Commerce / Cumann Trachtala Corcaighe is a Company Limited by Guarantee not having a share capital. Our registered address is Fitzgerald House, Summerhill North, Cork. By joining Cork Chamber of Commerce and/or by visiting this website, you are accepting the terms of this Data Protection and Privacy Policy. Any external links to other websites are clearly identifiable as such, and we are not responsible for the content or the privacy policies of these other websites. Naturally, if you are not happy with this policy you should not use this website and you should inform the Team at Cork Chamber of Commerce immediately, as this may affect how Cork Chamber of Commerce interacts with you as an individual and a member company. Our Data Leader is Naoimh Frawley and she can be contacted at naoimh@corkchamber.ie.

GENERAL STATEMENT

Cork Chamber of Commerce respects your right to privacy and will not collect any personal information about you on this website without your clear permission. Any personal data that you volunteer to Cork Chamber of Commerce, if retained, will be held on secure servers and will only be used to better our service offering. The nature of the Internet is such that we cannot guarantee or warrant the security of any information you transmit to us via the Internet. No data transmission over the Internet can be guaranteed to be 100% secure. However, we will take all reasonable steps (including appropriate technical and organisational measures) to protect your personal data. This Policy will be continuously assessed against new technologies, business practices, regulatory changes and the evolving needs of the Chamber and the services we provide. Any changes to this Data Protection and Privacy Policy will be posted on this website so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

1. HOW WE COLLECT AND USE YOUR PERSONAL DATA

Personal data is data that identifies you or can be used to identify or contact you and may include, for example, your name, address or e-mail address, occupation and photograph. In certain circumstances you will provide us with your personal data directly or your data may be supplied by your member organisation/business. We do not collect any sensitive personal data by design, however in certain circumstances we will hold sensitive personal data about you by default where this information forms part of your personal contact details and is publicly available, for example, the political affiliation of members of government who are legitimate business contacts of our organisation.

Website

Cork Chamber of Commerce does not collect any personal data about you from this website, apart from information that you volunteer (for example by e-mailing us or by completing any of our on-line forms or physical application form).

Like most websites, we gather statistical and analytical information collected on an aggregate basis of all visitors to our website. This non-personal data comprises information that cannot be used to identify or contact you.

Please also refer to our Cookies Policy.

Chamber Members, Prospective Members and Contacts

Any personal data collected about our members, prospective members and our legitimate business contacts is stored in the Chamber's Customer Relationship Management (CRM) system and other appropriate data management systems which may be paper based or electronic. We process your personal data in accordance with the aims of our Chamber i.e., to provide the means whereby persons engaged in business can network and meet to grow and promote business activity; to encourage economic development and growth across the Cork region and Ireland; and to formulate policy on issues of the day affecting the interests of members, to advocate and lobby on behalf of members and to acquire and disseminate useful knowledge to members.

Your personal data will be processed for the following purposes:

- (a) To contact you in relation to our events programme, general news from Cork Chamber of Commerce and other communications from Cork Chamber of Commerce deemed to be of possible interest to you, as an individual and/or company;
- (b) to contact you in response to communications you might send us;
- (c) to provide you with the information / service you have requested;
- (d) to provide contact information for your company in our Membership Directory, both online and hardcopy;
- (e) to deliver relevant marketing information to you and to ensure that content from our website is presented in the most effective manner for you and for your computer;
- (f) to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; and
- (i) to send you email alerts and newsletters that you receive as a term of your membership or that have opted-in to receive by filling in our online forms or contacting us by email or by other means. We also provide the facility to opt-out of receiving such communication on the site and within each such email we send you.

We rely upon the following legal bases in controlling and processing your personal data:

- (i) where such processing is necessary for the performance of your membership application or contract with us;
- (ii) where such processing is in our legitimate interests in conducting our business in a responsible and commercially prudent manner;
- (iii) to comply with our legal and regulatory obligations; and
- (iv) in limited circumstances, your explicit 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.

We will not process your personal data for any of these purposes if to do so would constitute an Unwarranted

interference with your interests, rights and freedoms We only collect the minimum amount of personal information necessary.

CCTV, Photography & Video Recording

We do not operate CCTV at our premises Fitzgerald House, Summerhill North, Cork. We do operate a real time camera monitor to alert us to guests and business activity in our reception area.

At the vast majority of Chamber events and meetings, photography and/or video recording take place. In accordance with the legitimate business and promotional interests of the Chamber your image may be used in our publications and website. If you do not consent to this use, please advise a member of staff prior to or on arrival at the meeting and/or event. You will be advised whether it is possible to accede to your request. If it is not possible for us to confirm that your image will not be used in our publications and/or website, even in an inadvertent manner, we will offer you a refund of any attendance fee. We strongly advise that you make any such enquiry at the time of booking.

However, where our events and/or meetings are held in public venues and in accordance with the legitimate business and promotional interests of the Chamber members of the press and press photographers/videographers are present, we do not control the publication of press photography and/or reporting.

The Requirement to process personal data.

The provision of your personal data for the purposes described above is a contractual requirement. In addition, we may need to process your personal data to comply with statutory requirements, such as keeping proper records of financial transaction. We cannot continue to facilitate and administer your membership or relationship with us, if you fail to provide your personal data for the purposes described above.

2. HOW IS YOUR INFORMATION SHARED?

Your information will be shared as required with relevant persons for legitimate and reasonable purposes. We will process and share your data with our accountant(s) and other professional advisors when required. Our service providers may only process the data of our members for the purpose of providing us with their services, and no other purpose. We may also share certain parts of your data when we are required to do so with competent regulatory authorities and bodies as requested or required by law.

We reserve the right to transfer information (including your Personal Data) to a third party in the event of a restructuring of our organisation, provided that the third party has an equivalent privacy policy in place and all necessary legal requirements are complied with.

Transfers of data outside the European Economic Area (EEA)

We transfer data to processors located outside the EEA. Your data may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. The safeguard we have put in place for this transfer is to enter into European Commission approved standard contractual clauses with the provider.

If you wish to receive more information relating to our Processors and/or transfers outside of the EEA, please contact us at the contact details at the start of this privacy notice.

3. WHAT ARE YOUR RIGHTS RELATING TO PERSONAL DATA?

You may request information regarding personal data relating to you, how it is stored, how the data was collected, and for what purpose. If personal data is incorrect or incomplete, you may request for it to be corrected or supplemented. You may request that your data is deleted if the processing of such data has no legal basis, or if the legal basis has ceased to apply. The same applies if the purpose behind the data processing activity has lapsed or ceased to be applicable for other reasons. However, retention requirements must be observed. You have the right to data portability i.e. you have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, commonly used machine readable format. If the very limited circumstances where we may be processing personal data based on your consent, you may withdraw that consent at any time. This does not affect the lawfulness of processing which took place prior to its withdrawal.

If you are unhappy with how we process personal data, we ask you to contact us so that we can rectify the situation.

You may lodge a complaint with a supervisory authority. The Irish supervisory authority is the Data Protection Commission.

In order to exercise any of the rights set out above, please contact us at the contact details at the start of this privacy notice.

4. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will retain your personal data (including sensitive data) on an ongoing basis, for as long as we have a relationship with you, and in order for us to:

- (a) comply with our legal records retention obligations and for any extended period reasonably determined necessary;
- (b) to investigate or process complaints and/or defend or bring legal claims or complaints.

We will automatically delete your personal data once it is no longer required for these purposes. If you wish to request that your personal data is deleted in advance of our routine deletion or for further details of our data retention procedures, please send a request us to the contact details at the start of this privacy notice.

5. HOW DO WE KEEP YOUR PERSONAL DATA SAFE?

We take steps through organisational and technical measures to ensure that the personal and sensitive information we hold about you is held securely and to protect against the loss or misuse of your information. Any breach of your personal or sensitive data is notified and managed in accordance with our Data Breach Notification Procedure.