

## **DUBLIN MOUNTAINS PARTERSHIP PRIVACY POLICY (last revised on 20<sup>th</sup> August 2018)**

This privacy and cookies policy (“**Policy**”) refers to the website [www.dublinmountains.ie](http://www.dublinmountains.ie) (the “**Website**”). The Website is operated by Coillte Cuideachta Gníomhaíochta Ainmnithe, a company incorporated in Ireland with registration number 138108 and a registered address at Dublin Road, Newtownmountkennedy, Co. Wicklow (“**we**”, “**our**” or “**Coillte**”). Coillte work with the Dublin Mountains Partnership (“**DMP**”) to improve the recreational experience of users in the Dublin Mountains (the “**Services**”). This Policy applies to all Services offered on the Website.

The Policy sets out the basis on which any personal data which we collect from you, or that you provide to us, will be processed by us. In this Policy, the term “personal data” means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, our possession, and includes personal data as described in Data Protection Legislation (as defined below).

Please read the following carefully. Entering into this Website and providing your consent to our use of your personal data in accordance with the terms of this Policy indicates that the user (either “**user**” or “**you**”) has reviewed this Policy and has agreed to be bound by it. If you do not agree to these terms you must leave the Website immediately.

We will handle your personal data in accordance with Data Protection Legislation. “**Data Protection Legislation**” means the Data Protection Acts 1988 and 2003 and Directive 95/46/EC, any other applicable law or regulation relating to the Processing of personal data and to privacy (including the E-Privacy Directive and the European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011 (“**E-Privacy Regulations**”), as such legislation shall be amended, revised or replaced from time to time, including by operation of the General Data Protection Regulation (EU) 2016/679 (“**GDPR**”) (and laws implementing or supplementing the GDPR, and laws amending or supplementing the E-Privacy Regulations).

### **1. INFORMATION WE GATHER FROM YOU**

We fully respect your right to privacy in relation to your interactions with the Service and endeavour to be transparent in our dealings with you as to what information we will collect and how we will use your information. Also, we only collect and use individual’s information where we are legally entitled to do so. Information in relation to personal data collected by Irish entities is available on [www.dataprotection.ie](http://www.dataprotection.ie), the website of the Irish Data Protection Commissioner (“**DPC**”).

We may collect personal data from you in the course of our dealings with you, including through your use of our Website, when you contact or request information from us, when you engage our Service or when you register with us. The information that we process includes: (i) registration information such as your name, email address and password (for DMP Volunteer Rangers (“**Rangers**”) and recreation manager only); (ii) contact information, such as your email address and phone number(s) and a phone number of an individual known to you 'In Case of Emergency'; (iii) technical information, such as your IP address and information from your visits to our Website or applications or in relation to materials and communications we send to you electronically; or (iv) any other information relating to you which you may provide to us. Coillte is a Data Controller (as defined in Data Protection Legislation) in respect of the personal data we collect from you. If you are aged 18 or under, please get your parent/guardian’s permission before you provide any personal data to us.

### **HOW WILL WE USE THE INFORMATION WE GATHER?**

We will use the information we collect from you to:

Respond to your enquiry;

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Register you or any other person registered by you for a walk or event;  
Provide your name (and any other person's name you have registered), phone number, email address and  
In Case of Emergency (ICE) contact details to the Rangers when you register for a walk or an  
event;  
Understand how visitors interact with our Website; and  
Produce statistics to improve and develop our Website and Service.

We collect information from you as necessary in the course of providing our Service. We may collect your personal information while monitoring our technology tools and services, including our Website and email communications sent to and from us. We gather information about you when you provide it to us, or interact with us directly.

We use that information: (i) to provide and improve our Website, including auditing and monitoring its use; (ii) to provide and improve our Service to you; (iii) to provide information requested by you; (iv) to manage and administer our relationship with you; or (vi) to fulfil our legal, regulatory and risk management obligations.

Where we wish to use your personal data in any other way, we will ensure that we notify you and get your consent first. You will be given the opportunity to withhold or withdraw your consent for the use of your personal data for purposes other than those listed in this Privacy Policy.

We wish to remind you that this Policy applies to personal data that we collect/process through your use of the Website. It does not apply to any links to third-parties' websites and/or services, such as third-party applications, that you may encounter when you use the Website. You acknowledge that the Service that we provide may enable or assist you to access the website content of, correspond with, and purchase products and services from, third parties via third-party websites and that you do so solely at your own risk. We make no representation or commitment and shall have no liability or obligation whatsoever in relation to the content or use of, or correspondence with, any such third-party website, or any transactions completed, and any contract entered into by you, with any such third party and the use by any such third-party of your personal data. We do not endorse or approve any third-party website nor the content of any of the third-party website made available via the Website. We encourage you to carefully familiarise yourself with terms of use and privacy policies applicable to any websites and/or services operated by third parties. Please be aware that we are not responsible for the privacy practices of any third parties.

The personal data that we collect from you will be transferred to, and stored by, Coillte. It may also be processed by our staff. By submitting your personal data, you agree to this transfer, storing or processing of your personal data by Coillte for the purposes set out in this Policy.

## **COOKIES**

A cookie is a small text file that is placed on your device by a web server which enables a website and/or mobile app to recognise repeat users, facilitate the user's ongoing access to and use of a website and/or mobile app and allows a website and/or mobile app to track usage behaviour and compile aggregate data that will allow content improvements and targeted advertising. We collate information on in relation to the Service which is represented in aggregate format through cookies. They help us to improve our Service and to deliver many of the functions that make your browser experience more user friendly.

By using the Service and accepting the terms of this Policy you are consenting to the use of cookies as described in this Policy (i.e. you are agreeing to the placement of cookies on your device unless you specifically choose not to receive cookies). You will be given the opportunity to object to the use of cookies on the Website by way of a 'pop-up'.

The 'Help Menu' on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether. You can also disable or delete similar data used by browser add-ons, such as flash cookies, by changing the add-on's settings or visiting the Website of its manufacturer.

For more information about cookies and managing them including how to turn them off, please visit [www.cookiecentral.com](http://www.cookiecentral.com). However, because cookies allow you to take advantage of some of our Website's essential features, we recommend you leave them turned on as otherwise you may not be able to fully experience the interactive features of our Website or other related websites which you visit.

We may use third parties such as Google Analytics to collect user information, including through the use of cookies (flash and non-flash) and web beacons. They help us to improve our Website and to deliver many of the functions that make your browser experience more user friendly.

You can find a list of cookies we use and the purposes for which we use them in the tables below.

**FIRST PARTY COOKIES**

<b>COOKIE</b>	<b>PURPOSE</b>	<b>EXPIRES</b>
PHPSESSID	This plugin is used to store a simple message when a form is submitted that can be displayed on a different page. For example, if an enquiry form is completed incorrectly, a message will be stored and presented to the user to indicate the errors in the submission. When an enquiry form is submitted successfully, a message is stored and presented to the user thanking them for their enquiry.	This is a session cookie, so it will expire when the user's browser is closed and be recreated the next time the user visits the site. This cookie is only set when the user is logged in.
_utma (Google Analytics)	Google Analytics tracking cookies to collect anonymous traffic data about the use of the Website.	2 years
be_typo_user fe_typo_user	These cookies are necessary for the Website to function.	This cookie only applies when a user is using the Website.

You should also be aware that there are cookies which are found in other companies' internet tools which we may use to enhance the Website.

**ARE THERE CASES WHERE WE MAY USE YOUR INFORMATION TO CONTACT YOU?**

We may contact you for administration reasons related to the Service to which you have signed up reminders or to notify you that a particular service, activity or online content has been suspended for maintenance, or in response to a question that you ask us).

When you register for a walk and email the Ranger at [ranger@dublinmountains.ie] the Ranger will respond to you from his/her personal email address to confirm your registration.

## **WHAT RIGHTS DO YOU HAVE?**

As a data subject, you have the following rights under the Data Protection Legislation:

- the right of access to personal data relating to you;
- the right to correct any mistakes in your personal data;
- the right to ask us to stop contacting you with direct marketing;
- rights in relation to automated decision taking;
- the right to restrict or prevent your personal data being processed;
- the right to have your personal data ported to another data controller;
- the right to erasure; and
- the right to complain to the DPC if you believe we have not handled your personal data in accordance with Data Protection Legislation.

These rights are explained in more detail below, but if you have any comments, concerns or complaints about our use of your personal data, please contact us (see 'How To Contact Us' below). We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex or cumbersome, in which case we will respond within three months (we will inform you within the first month if it will take longer than one month for us to respond). Where a response is required from us within a particular time period pursuant to Data Protection Legislation, we will respond within that time period.

### **Right to access to personal data relating to you**

You may ask to see what personal data we hold about you and be provided with:

- a summary of such personal data and the categories of personal data held (see Sections 1 and 2 above);
- details of the purpose for which it is being or is to be processed (see Section 2 above);
- details of the recipients or classes of recipients to whom it is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers (see Section 7 below);
- details of the period for which it is held or the criteria we use to determine how long it is held (see Section 12 below);
- details of your rights, including the rights to rectification, erasure, restriction or objection to the processing (set out in this Section 5);
- any information available about the source of that data (see Section 1 above);
- whether we carry out automated decision-making, or profiling, and where we do, information about the logic involved and the envisaged outcome or consequences of that decision making or profiling (please note that we do not currently carry out any profiling – we will notify you if this changes); and
- where your personal data are transferred out of the EEA, what safeguards are in place (see Section 7 below).

Requests for your personal data must be made to us (see 'How To Contact Us' below) specifying what personal data you need access to, and a copy will be retained on your personnel file. To help us find the information easily, please give us as much information as possible about the type of information you would like to see.

If, to comply with your request, we would have to disclose information relating to or identifying another person, we may need to obtain the consent of that person, if possible. If we cannot obtain consent, we may need to withhold that information or edit the data to remove the identity of that person, if possible.

There are certain types of data which we are not obliged to disclose to you, which include personal data which records our intentions in relation to any negotiations with you where disclosure would be likely to prejudice those negotiations.

We are entitled to refuse a data access request from you where (i) such request is manifestly unfounded or excessive, in particular because of its repetitive character (in this case, if we decide to provide you with the personal data requested, we may charge you a reasonable fee to account for administrative costs of doing so), or (ii) we are entitled to do so pursuant to Data Protection Legislation.

### **Right to update your personal data or correct any mistakes in your personal data**

You can require us to correct any mistakes in your personal data which we hold free of charge. If you would like to do this, please:

- email or write to us (see 'How To Contact Us' below);
- let us have enough information to identify you (e.g. name, registration details); and
- let us know the information that is incorrect and what it should be replaced with.

If we are required to update your personal data, we will inform recipients to whom that personal data have been disclosed (if any), unless this proves impossible or has a disproportionate effort.

It is your responsibility that all of the personal data provided to us is accurate and complete. If any information you have given us changes, please let us know as soon as possible (see 'How To Contact Us' below).

### **Right to restrict or prevent processing of personal data**

In accordance with Data Processing Legislation, you may request that we stop processing your personal data temporarily if:

- you do not think that your personal data is accurate (but we will start processing again once we have checked and confirmed that it is accurate);
- the processing is unlawful but you do not want us to erase your personal data;
- we no longer need the personal data for our processing; or
- you have objected to processing because you believe that your interests should override the basis upon which we process your personal data.

If you exercise your right to restrict us from processing your personal data, we will continue to process the personal data if:

- you consent to such processing;
- the processing is necessary for the exercise or defence of legal claims;
- the processing is necessary for the protection of the rights of other individuals or legal persons;
- or
- the processing is necessary for public interest reasons.

### **Right to data portability**

In accordance with Data Protection Legislation, you may ask for an electronic copy of your personal data that you have provided to us and which we hold electronically, or for us to provide this directly to another party. This right only applies to personal data that you have provided to us – it does not extend to data generated by us.

The right to data portability also only applies where:

- the processing is based on your consent or for the performance of a contract; and
- the processing is carried out by automated means.

### **Right to erasure**

In accordance with Data Protection Legislation, you can ask us to erase your personal data where:

- you do not believe that we need your personal data in order to process it for the purposes set out in this Policy;
- if you had given us consent to process your personal data, you withdraw that consent and we cannot otherwise legally process your personal data;
- you object to our processing and we do not have any legal basis for continuing to process your personal data;
- your data has been processed unlawfully or have not been erased when it should have been; or
- the personal data have to be erased to comply with law.

We may continue to process your personal data in certain circumstances in accordance with Data Protection Legislation.

Where you have requested the erasure of your personal data, we will inform recipients to whom that personal data have been disclosed, unless this proves impossible or involves disproportionate effort. We will also inform you about those recipients if you request it.

### **Right to complain to the DPC**

If you do not think that we have processed your personal data in accordance with this Policy, please contact us in the first instance. If you are not satisfied, you can complain to the DPC or exercise any of your other rights pursuant to Data Protection Legislation. Information about how to do this is available on the DPC website at <https://www.dataprotection.ie>.

### **OFFENSIVE CONTENT**

If you post or send content which may reasonably be deemed to be offensive, inappropriate or objectionable anywhere on the Website or otherwise engage in any disruptive behaviour on any of our Services, we may remove such content.

Where we reasonably believe that you are or may be in breach of any applicable laws, for example on hate speech, we may disclose your personal information to relevant third parties, including to law enforcement agencies or your internet provider. We would only do so in circumstances where such disclosure is permitted under applicable laws, including Data Protection Legislation.

## **DO WE PROTECT YOUR PERSONAL INFORMATION?**

We do our utmost to protect user privacy through the appropriate use of security technology. We restrict access to personal data to employees, contractors and agents who need to know such personal data in order to operate, develop or improve the services that we provide. We ensure that we have appropriate physical and technological security measures to protect your information; and we ensure that when we outsource any processes that the service provider has appropriate security measures in place. However, the Website contains hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, including cookies. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

We will implement appropriate technical and organisational measures to ensure a level of security appropriate to the risks that are presented by the processing of your personal data. In particular, we will consider the risks presented by accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of any data transmitted to our Website and any such transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. We are not responsible for any delays, delivery failures, or any other loss or damage resulting from (i) the transfer of data over communications networks and facilities, including the internet, or (ii) any delay or delivery failure on the part of any other service provider not contracted by us, and you acknowledge that the Website may be subject to limitations, delays and other problems inherent in the use of such communications facilities. You will appreciate that we cannot guarantee the absolute prevention of cyber-attacks such as hacking, spyware and viruses. Accordingly, you will not hold us liable for any unauthorised disclosure, loss or destruction of your personal data arising from such risks.

## **BREACH REPORTING**

We will notify serious data breaches to the DPC without undue delay, and where feasible, not later than 72 hours after having become aware of same. If notification is not made after 72 hours, we will record a reasoned justification for the delay; however, it is not necessary to notify the DPC where the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. A personal data breach in this context means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

We will keep a record of any data breaches, including their effects and the remedial action taken, and will notify you of any data breach affecting your personal data (which poses a high risk to you) when we are required to do so under Data Protection Legislation. We will not be required to notify you of a data breach where:

- we have implemented appropriate technical and organisational measures that render the personal data unintelligible to anyone not authorised to access it, such as encryption; or
- we have taken subsequent measures which ensure that the high risk to data subjects is not likely to materialise; or
- it would involve disproportionate effort, in which case we may make a public communication instead.

## **WHO WE SHARE DATA WITH**

We disclose your personal information to the DMP, including its Rangers. The Rangers will retain your personal data until he/she has completed a duty report for the walk/event that you have registered for. Such report is submitted by the Ranger to the DMP for storage.

We also use service providers to help us run the Website or services available on the Website. Any third parties who access your data in the course of providing services on our behalf are subject to strict contractual restrictions to ensure that your data is protected, in compliance with Data Protection Legislation.

## **WHERE WE STORE YOUR PERSONAL DATA**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you consent to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy. The safeguards in place with regard to the transfer of your personal data outside of the EEA are the entry by us into appropriate contracts with all transferees of such personal data.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## **RETENTION OF PERSONAL DATA**

We only retain personal data of individuals who have attended a walk/event with the DMP. We will retain your personal data for three and a half years from the date you attended a walk/event with the DMP.

## **CHANGES TO THE POLICY**

This Policy may be updated from time to time, so you may wish to check it each time you submit personal information to the Website. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use this Website to submit personal information. If material changes are made to the Policy, we will notify you by placing a prominent notice on the Website. We will not process your personal data in a manner not contemplated by this Policy without your consent.

## **HOW TO CONTACT US**

The data controller (as defined in Data Protection Legislation) for the Website and services provided through the Website is Coillte Cuideachta Ghníomhaíochta Ainmnithe.

If you need to contact us with regard to any of your rights as set out in this Policy, all such requests should be sent by email [dpo@coillte.ie](mailto:dpo@coillte.ie) or made in writing to:

Data Protection Officer  
Coillte,  
Dublin Road,  
Newtownmountkennedy,  
Co. Wicklow,  
A63 DN25,  
Ireland.



