

Privacy Statement

Irish Paper Clearing Company Company Limited by Guarantee (IPCC)

IPCC respects your right to privacy and we comply with our obligations under the General Data Protection Regulation. In this statement we explain how and why we process your personal data, how we use it and how you can interact with us about it.

What is personal data?

Personal data is data that identifies you or can be used to identify or contact you. It may include your name, address, email address, employer name, title or position, user IP address, telephone numbers and debit/credit card details.

When does IPCC process your personal data?

IPCC may process your personal data in accordance with the rules of IPCC membership when members nominate contacts within their organisation to join working groups or to engage with IPCC for a particular purpose.

IPCC may process your personal data if you attend IPCC events, visit the Banking & Payments Federation Ireland (BPMFI) website, attend educational courses or if you or your employer, being a member of IPCC, provides your personal data to IPCC for a purpose related to member or IPCC activities. IPCC may also process personal data in relation to suppliers, service providers, vendors and other commercial entities.

In addition, IPCC engages with various stakeholders and may also process personal data of such stakeholders.

This is not an exhaustive list of the instances in which IPCC may process personal data.

We process personal data through our websites. Our websites use 'cookie' technology. A cookie is a little piece of text that our server places on your device when you visit any of our websites or applications. They help us make the sites work better for you.

How we use your personal data

We use your personal data to:

- Manage our contracts and relationships with our members, stakeholders, suppliers, service providers, vendors and other commercial entities.
- Perform our day to day operational and business processes.
- Give you access to on-going networking opportunities.
- Ensure we provide you with the best service.
- Collect membership fees.

To process your personal data, lawfully, we do so according to one of the following legal bases:

- Performance of a contract – we process your personal data where it is necessary to enter into and to perform our contract with you.
- Our legitimate interests or the legitimate interests of a third party (e.g. your employer) – when we process your personal data based on our legitimate interests, we balance any impact on you and your data protection rights with our legitimate interests.
- Your consent – you can withdraw your consent to the processing of your personal data by IPCC at any time (this right only applies where the sole legal basis for processing your personal data is your consent).
- Compliance with legal obligations.

How long we keep your information for

How long we hold your personal data depends on the nature of the personal data and the purpose for which it is processed. Personal data will be retained for no longer than is necessary for the purpose for which it was obtained by us, or as required or permitted for legal and regulatory purposes, and for legitimate business purposes. We determine appropriate retention periods which meet our legitimate business, legal and regulatory obligations.

If you wish to opt out of receiving marketing emails, newsletters or other such communications, you may do so at any time by emailing us at dataprotection@BPFI.ie.

Similarly, if you wish to exercise your rights as a data subject over any of the personal data which has been processed by IPCC, you may do so by emailing us at dataprotection@BPFI.ie.

Your personal data and third parties

Sometimes we share your personal data with trusted third parties such as service providers (auditors, legal advisors etc.) in accordance with the contracts we have in place with these third parties, employers and legal or regulatory bodies.

Where you provide us with personal data relating to other people, such as your directors, officers, employees, advisors or other related persons, you represent and warrant that you will only do so in accordance with applicable data protection laws. You will ensure that before doing so, the individuals in question are made aware of the fact that we will hold personal data relating to them and that we may use it for any of the purposes set out in this statement, and where necessary you will obtain their consent to our use of their personal data.

We may obtain personal data relating to you indirectly, such as where your employer provides your contact details to us in connection with our business. The person providing the personal data will in the ordinary course be asked to warrant that it will only do so in accordance with applicable data protection laws, and that it will ensure that before doing so, you are made aware of the fact that we will hold personal data relating to you and that we may use it for any of the purposes set out in this statement, and where necessary that it will obtain consent to our use of the personal data.

Security

Once we receive your personal data, we use appropriate security measures (including firewalls and anti-virus protection) to protect your personal data.

International transfers of data

Your personal data may be transferred outside of the European Union to service providers who use resources or data processing facilities outside of the European Union. We will only transfer your personal data where the EU Commission has decided that the third country in question ensures an adequate level of protection in line with EU data protection standards, or where there are appropriate safeguards in place to protect your personal data.

Your rights

When your personal data is processed by IPCC you are entitled to rely on a number of rights such as:

- Accessing your personal data – you can ask us for a copy of the personal data we hold about you.

- Correcting and updating your personal data – if you believe that any personal data we hold about you is inaccurate or out of date you can look for the personal data to be corrected at any time.
- Restricting and objecting – you may have the right to restrict or object to us using your personal data.
- Deleting your personal data – you may have the right to ask us to delete your personal data.
- Withdrawing consent – you can change your mind wherever you have given us consent such as for direct marketing.
- Making a complaint – you also have the right to lodge a complaint about our processing of your personal data with the Data Protection Commission by emailing info@dataprotection.ie or writing to the following address: Data Protection Commission, Canal House, Station Road, Portllington, R32 AP23, Co. Laois. You can visit the website of the Data Protection Commission at www.dataprotection.ie for more details.

Please note that your rights in relation to your personal data may be limited and we must comply with our legal obligations under applicable data protection law.

Personal data which you provide to us

It is your responsibility to ensure that all personal data you provide to IPCC is complete, accurate and up to date. You may provide personal data about other people during our dealings with you. In such cases, you must ensure that you are entitled to disclose the personal data relating to that other person to IPCC and that we may process the personal data in accordance with this statement, without having to take further steps. In such cases, it is your responsibility to ensure that the people concerned are aware of the contents of this statement.

Contacting IPCC

Any queries regarding your data should be sent to dataprotection@BPFI.ie and they will be processed in accordance with applicable data protection legislation. In the event that your query has not been resolved to your satisfaction, you have the right to raise the matter with the Data Protection Commissioner, Lo-call 1890 252231 or email info@dataprotection.ie.

Further information may be obtained by contacting the person responsible for data protection at the address below.

Ann Smith
Nassau House
Nassau Street
Dublin 2
Tel: +353 1 671 5311
Email: dataprotection@BPFI.ie

Updates to this statement

We keep this statement under regular review and will make changes from time-to-time, particularly when we change how we use your personal data and change our technology and products or services. Any changes to this statement will take immediate effect. You should check this page from time to time to take note of any changes we make, as they will be binding on you.

You may view the most up to date privacy notice on-line at the following address.

<https://www.BPFI.ie/data-privacy-notice-IPCC/>