
DATA PROTECTION AND PRIVACY NOTICE

This Data Protection and Privacy notice is effective as and from 25 May 2018

At Future Analytics Consulting, we are committed to ensuring that your privacy is protected. Our use of your personal information is governed by this data protection statement.

In this statement we use the terms “FAC”, “we”, “our” and “us” to refer to Future Analytics Consulting Limited, having its registered office at 23 Fitzwilliam Square South, Dublin 2, D02RV08.

FAC is the controller responsible for the personal information it collects, uses and stores about you.

WHAT IS PERSONAL INFORMATION?

Personal information is any information that allows us to identify you. This could include information such as your name, postal address, telephone number, email address, date of birth or bank account details.

Any references to personal information in this data protection statement will include personal data, and where relevant, special categories of personal data. You can find out more about special categories of data below.

APPLICATION OF THIS NOTICE

IMPORTANT: Please note that this notice, while intended to be as complete and accurate as reasonably possible, is not exhaustive and may be updated from time to time.

When engaging with FAC, we will collect Personal Data:

from you: for example, through the information you provide to us in applying for a position, the Personal Data you supply via our website, email, telephone or through your engagement with us at FAC events or as a recipient of FAC Services.

from third party sources: including contact details, software platforms we use for business processes, information from statutory and regulatory authorities and occasionally some additional sources.

WHAT PERSONAL DATA DO WE PROCESS?

Set out below are some of the types of personal information that we may collect, use and store about you and the reasons for doing so.

Information:

1. your name
2. your employer, your job title and/or position
3. your contact details, including your address and phone number
4. details of your attendance at our events, photos and your social media profile and posts
5. your financial information
6. details of your visits to FAC
7. your correspondence, communications and connections with FAC staff
8. publicly available information
9. any information which is provided to us by you or on your behalf
10. Information relating to your online activities including your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access any website operated by us

We will use this information to:

- contact you for the purposes of providing commercial services and/or advice which you have requested from us [1, 2, 3, 4, 7, 9]
- contact you outside of working hours or in the event there is a matter requiring your urgent attention when you engage us to carry out representations on your behalf [1, 3, 7, 9]
- contact you for specific marketing purposes, namely, periodic updates on work we have undertaken for you or other clients and to outline potential opportunities tailored to your interests [1, 2, 3, 8, 9, 10]
- make or receive payments to and from you and for the purposes of fraud prevention [1, 2, 3, 5, 7, 9]
- maintain visitor records for health & safety and security obligations [1, 4, 6]
- maintain records of project-relevant communications [1, 2, 3, 4, 6, 7, 9]
- provide you with services which you have requested from us [1 - 10]
- to monitor the effectiveness of our website [10]
- to deliver relevant website content and advertisements to you and [10]
- to measure or understand the effectiveness of the advertising we serve to you [1, 2, 4, 7, 8, 9, 10]

We collect this information by using cookies, server logs and other similar technologies when you interact with our website(s) or our employees. We may also receive technical data about you if you visit other websites using our cookies.

We also collect, use and store **aggregate data**.

Aggregate data is information gathered and expressed in a summary form for purposes such as statistical or demographic analysis. Aggregate data may be derived from your personal information but is not data that directly or indirectly reveals your identity.

For example, we may aggregate information relating to your use of our website to calculate the percentage of users accessing a specific feature on our website. If we combine or connect aggregate data with your personal information so that it can directly or indirectly identify you, we consider the combined data as personal information, which will be treated in accordance with this data protection notice.

We do not collect any special categories of personal information.

Special categories include details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions and health. Nor do we collect any criminal conviction information.

However, if it is necessary to collect special categories of personal information and/or criminal conviction information, we will only do so with your explicit consent and we will explain the purpose for which the information will be used at the point when we ask for your consent.

PURPOSE AND LEGAL BASIS

Under data protection law we are only permitted to collect and use your personal information if we have a legal basis for doing so. We rely on the following legal bases to do this:

a) In order to enter into and perform a contract with you:

We may use your information in order to enter into a contract with you or to provide you with a service that you have requested from us.

b) In order to comply with a legal obligation:

We are required to use your personal information to comply with certain legal and regulatory obligations to which we are subject. For example:

- We are obliged to obtain certain business records in accordance with company and revenue law requirements, which may include your personal information.
- Anti-money laundering legislation requires us to keep customer and other related parties' personal information for a period of at least five years after the relationship ceases with the customer or the date of the last transaction, whichever is later.
- Health and safety legislation requires us to keep records of persons attending properties that we are marketing.

c) For our legitimate interests

We may use your personal information for the purposes of carrying out activities that are in our legitimate interests (or those of a third party). When we use your personal information in this way, we ensure that there is a fair balance between our legitimate interest and your fundamental rights and freedoms.

Our legitimate interests include developing our business and tailoring our offering to meet the needs of our existing and prospective customers. In pursuing these legitimate interests, we may use your personal information to carry out research in order, for example, to identify trends for the purpose of improving our service.

We may also use your personal information to manage and operate the administrative and technical aspects of our business efficiently and effectively. This will include verifying the accuracy of information that we hold about you to create a better understanding of you as a customer and taking steps to protect your information against loss, damage, theft or unauthorised access.

In more limited circumstances we may also rely on the following legal bases:

- Where we need to protect your interests (or someone else's interests); and/or
- Where your personal information is needed in the public interest or for official purposes.

d) With your explicit consent

We may send you marketing materials by post, text, email and/or phone from time to time after you have engaged us to provide services or received services from us either which may be similar and of interest to you or where you have expressly indicated that you would like to receive such information.

You can withdraw this consent at any time by emailing us at info@futureanalytics.ie or by writing to us at Future Analytics Consulting, 23 Fitzwilliam Square South, Dublin 2, D02RV08.

WHO IS YOUR DATA SHARED WITH?

- **Third Party Service Providers**

We may share your personal information with third party service providers that perform services and functions at our direction and on our behalf. Such third-party services providers include accountants, legal advisers, IT service providers, security services providers, administrative services providers and marketing agencies engaged by FAC. In all cases, we will ensure that third parties adhere to the same controls and handling of your personal information.

- **Other entities within FAC**

Where we convert your information into statistical or aggregate data in such a way as to ensure that you are not identified or identifiable from it, we may pass this information on to other FAC teams for analytical and statistical purposes.

- **An Garda Síochána, government or quasi-government bodies, courts and tribunals**

We may share your personal information with these organisations and bodies were required to do so by law.

TRANSFERS OF YOUR PERSONAL DATA

We may transfer, store or process your personal information to countries outside the European Economic Area. Where the laws of such countries do not afford an equivalent level of protection of personal information as the laws of Ireland, we take specific steps in accordance with data protection law to protect your personal information.

We'll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA.
- Put in place a contract with the recipient of the personal information that means they must protect it to the same standards as the EEA.
- Transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA.

HOW LONG DO WE RETAIN YOUR DATA?

The period for which we will keep your personal information will depend on the type of service you have requested from us. The retention period may be longer than the period for which we are providing services to you where, for example, we have a legitimate interest in retaining such information that is not outweighed by your fundamental rights and freedoms, where we have statutory or regulatory obligations to retain personal information for a longer period, or where we may need to retain the information in the event of a legal claim.

WHAT HAPPENS IF YOU DO NOT PROVIDE INFORMATION THAT WE REQUEST?

We need some of your personal information to perform the services you have requested from us. For example, where we are handling a planning application on your behalf, we require your contact information so that we can update you with information on preparation of the application, its filing and post-filing follow-up.

We also need some information from you so that we can comply with our legal obligations. For example, we may need identity and financial documents from you to meet our obligations to prevent fraud and money laundering.

If you do not provide the information required for these purposes, we will not be able to perform our contract with you and may not be able to provide services to you or continue to provide certain services to you. We will explain when this is the case at the point where we collect information from you.

HOW DO WE SECURE YOUR PERSONAL DATA?

We want to give you the confidence that your Personal Data is secure. FAC has a series of policies and procedures in place to ensure your Practical Data is safe.

We are committed to taking reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures.

WHAT RIGHTS DO YOU HAVE?

Under the GDPR, you have a number of rights such as;

- **Right of Access:** You have the right to ascertain what type of Personal Data FAC holds about you and to receive a copy of this Personal Data.
- **Right to Complain:** You have the right to lodge a complaint regarding the processing of your Personal Data to the Data Protection Commission.
- **Right to Erasure:** In certain circumstances you may request that we delete the Personal Data that we hold on you.
- **Right to Object:** Where we rely on our legitimate interests to process your Personal Data, you have a right to object to this use. We will desist from processing your personal information unless we can demonstrate an overriding legitimate interest in its continued processing.
- **Right to Portability:** You may request us to provide you with certain Personal Data which you have given us in a structured, commonly used and machine-readable format and you may request us to transmit your Personal Data directly to another data controller where this is technically feasible.
- **Right to Rectification:** You have the right to have any inaccurate Personal Data which we hold about you updated or corrected.
- **Right to Restriction:** You have the right to request that FAC stop using your Personal Data in certain circumstances including if you believe that the Personal Data we hold about you is inaccurate or that our use of your Personal Data is unlawful. If you validly exercise this right, we will store your Personal Data and will not carry out any other processing until the issue is resolved.

You can exercise any of these rights by submitting a request to us at the details below.

COMPLAINTS AND CONTACT DETAILS

Complaints

If you have any complaints about the way we use your personal information, please contact us using the details below and we will try to resolve the issue. If we cannot resolve any issue, you have the right to complain to the Data Protection Commissioner. You can find further information about the Data Protection Commissioner at www.dataprotection.ie.

Contact details

If you have any questions, comments or requests regarding any aspect of this data protection statement, please do not hesitate to contact us by emailing us at william.hynes@futureanalytics.ie or post c/o William Hynes, Future Analytics Consulting, 23 Fitzwilliam Square South, Dublin 2, D02RV08.

We will provide you with information on any action taken upon your request in relation to any of these rights without undue delay and at the latest within 1 month of receiving your request. We may extend this up to 2 months if necessary however we will inform you if this arises. Please note that we may ask you to verify your identity when you seek to exercise any of your data protection rights.

UPDATES

We will update this data protection statement from time to time. Any updates will be made available and, where appropriate, notified to you.

If at any time we decide to use your Personal Data in a manner significantly different from that stated in this notice, or otherwise disclosed to you at the time it was collected, we will notify you by e-mail or post, and you will have a choice as to whether or not we use your Personal Data in the new manner.