



Leitrim County Council Website Privacy Statement

Document reference number	LCCDP06	Revision number	1.0
Document drafted by	K. Glancy	Document reviewed by	GDPR Working Group
Document approved by	LCC Management Team	Document approved by	23.11.2018
Next Review Date	23.11.2025	Date of withdrawal of obsolete document	

Amendment history			
Date	Revision level	Details of amendment	Approval signature
04/09/2023	1.0	Sections amended. <ul style="list-style-type: none"> • Our use of cookies • Does Leitrimcoco.ie share the information it receives? 	K Brett/ U Wall

Leitrim County Council - Data Privacy Statement

Introduction

Leitrim County Council has created this privacy statement in order to demonstrate our firm commitment to your privacy. This Privacy Statement will let you know how we look after your personal data. It also informs you as to our obligations and your rights under data protection law.

By visiting Leitrimcoco.ie, you are accepting the practices described in this Privacy Notice. This statement relates to our privacy practices in connection with the aforementioned websites. We are not responsible for the content or privacy practices of other websites. Any external links to other websites are clearly identifiable as such. Some technical terms used in this statement are explained at the end of this document.

Please note that this Privacy Statement is a general Leitrim County Council document about how we approach data protection as an Organisation. Each section of the County Council may maintain further specific privacy notices which detail the personal data collected, purposes of processing and legal basis etc.

If you have any questions re this privacy statement you can contact us at:

Leitrim County Council
Aras an Chontae
Carrick On Shannon
Co. Leitrim

T: 071 9620005

F: 071 9621982

E: customerservices@leitrimcoco.ie

1. General Statement

Leitrim County Council fully respects your right to privacy, and we will not collect any personal information about you on this website without your clear permission. Any information which you volunteer to Leitrim County Council's websites will be treated with the highest standard of security and confidentiality, strictly in accordance with the Data Protection Acts, 1988 to 2018 and the EU General Data Protection Regulation (EU Regulation 679/2016) (the "GDPR").

2. **Our use of cookies**

Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser to enable our systems to recognize your browser.

The "Help" portion of the toolbar on 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, or how to disable cookies altogether. However, cookies allow you to take full advantage of some of the account-based features of [Leitrimcoco.ie](http://www.leitrimcoco.ie) and we recommend that you leave them turned on.

Types of Cookies on www.leitrimcoco.ie website.

1. **Strictly Necessary**

Strictly necessary cookies make our website work. These cookies are essential for you to browse the website and use its features, such as page navigation, accessing secure areas of the site and complying with data protection and electronic privacy legislation. We can set these cookies without needing your consent as they are essential.

2. **Analytical Cookies**

We use Matomo Analytics to measure how you use the website so we can improve it based on user needs. See further information on privacy and Matomo Analytics <https://matomo.org/privacy/>

Matomo Analytics sets cookies that store anonymised information about:

- a. How you got to the site
- b. The pages you visit on this site and how long you spend on each page.
- c. What you click on while you are visiting the site.

3. **Marketing Cookies**

Marketing Cookies are cookies that help with our communications.

These cookies may be set by third party websites and do things like measure how you view YouTube videos that are on this site.

By using www.leitrimcoco.ie website, you consent to the processing of data about you by Matomo in the manner and for the purposes set out above.

3. What personal information about our service users does Leitrim County Council gather?

The information we learn from customers helps us personalise and continually improve your online experience at Leitrimcoco.ie and our other websites. Here are the types of information we gather:

3.1. Information you give to us:

We receive and store any information you enter on our website or give us in any other way. We have set out in this section examples of the personal data we may collect, use, store and transfer which we have grouped together as follows:

- Identity Data includes, for example, first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender;
- Contact Data includes, for example, billing address, delivery address, email address and telephone numbers;
- Technical Data includes, for example, 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 this website;
- Profile Data includes, for example, your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses;
- Usage Data includes, for example, information about how you use our website, products and services; and
- Marketing and Communications Data includes, for example, your preferences in receiving marketing from us and your communication preferences.

We use the information that you provide for such purposes as registering an account you create with us, responding to your requests, customizing our online services for you, improving our online services, and communicating with you.

Where a service user voluntarily provides personal information, the data will be used for analysis, research or customer service purposes only. Any personal data provided by you to us will be held in accordance with the data protection principles set out in the Data Protection Acts 1988 to 2018, Electronic Commerce Act, and the EU General Data Protection Regulation (EU Regulation 679/2016) (the "GDPR").

Leitrim County Council assures you that the identity of all who contact us through this website is kept confidential: we do not rent, sell, or exchange mailing lists, or otherwise disclose such information to third parties, except as may be required by law, or through voluntary cooperation with law enforcement authorities if we judge that such cooperation is necessary to combat fraud or other crime.

3.2. Automatic information:

When a service user engages in general web browsing no personal information is revealed to us, although certain statistical information is available to us from our website logs. For example, like many websites, we obtain certain types of information when your web browser (browsers are pieces of software that allow you to access the internet; examples include: Internet Explorer, Netscape, Opera, Mozilla, etc.) accesses Leitrimcoco.ie or our other websites. See the list below for examples:

- Internet Protocol (IP) address used to connect your computer to the internet (for example 192.168.88.21);
- Login—if using our account services;
- Email address—if you email any of our public email addresses; and
- Computer and connection information such as browser type and version, operating system, platform, referring url and pages visited.

Leitrim County Council will make no attempt to identify individual visitors or to associate the technical details listed above with any individual, except in cases where criminal activity has taken place or is reasonably suspected (i.e. in response to a "hacking" incident). It is the policy of Leitrim County Council never to disclose such technical information in respect of individual website visitors to a third party (except for law-enforcement bodies and then only in response to illegal activity such as "hacking"; and our Internet Service Provider which records such data on our behalf and which is bound by confidentiality provisions in this regard), unless obliged to disclose such information by a rule of law. The technical information will be used only by Leitrim County Council, and only for statistical and other administrative purposes. You should note that technical details, which we cannot associate with any identifiable individual, do not constitute "personal data" for the purposes of the Data Protection Acts, 1988 to 2018.

4. How do we collect your personal data?

We have listed below examples of how we might collect personal data relating to you:

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise;
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your interactions and pages you visit on the website. We collect this personal data by using cookies. We have described our cookie policy protocol above. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some elements of this website may become inaccessible or not function properly.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources;

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services based [inside OR outside] the EU;
- Identity and Contact Data from data brokers or aggregators based [inside OR outside] the EU; and
- Identity and Contact Data from publicly available sources such as Companies Registration Office and the Electoral Register based inside the EU

5. How will we use the personal data collected?

We will only process your personal data where we have a valid legal basis for doing so. .Most commonly, we will use your personal data on the following legal bases:

- Where we need to comply with a legal or regulatory obligation; and
- Where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

In some areas of our website, we may ask you to provide personal data to us and ask for your consent to our processing of such data.

6. Does Leitrimcoco.ie share the information it receives?

We may share your personal data with third parties in connection with our processing of your personal data.

We may share information where there is a statutory requirement to share information with a government agency or other local authority or where your information must be shared with another agency in order to answer a service user query, then the minimum amount of information required will be shared in an appropriate manner. Generally, information is shared with other agencies as an aggregate rather than as a specific piece of data.

We require all third parties to enter into a data processing/sharing agreement with us which complies with our obligations under the GDPR and the Irish Data Protection Acts 1988 to 2018. These agreements require third parties to have appropriate technical and organisational measures (including security systems) in place and only to use your personal data on our instructions and in accordance with data protection law.

We may choose to release automatic information (see above) and other information received, via the website, to companies and organisations for fraud protection and credit risk reduction purposes. Information of this type will only be shared about users who have caused or attempted to cause damage to www.leitrimcoco.ie or other council websites. This type of information would be shared only as a result of “hacking” attacks, fraud or other suspected illegal activities.

7. Security of your personal data

We take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. We limit access to your personal data to those employees, agents and other third parties who are required to have access to your personal data and where they have agreed that they are subject to a duty of confidentiality.

We have put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. We have procedures in place to deal with actual and suspected data breaches which include an obligation on us to notify the supervisory authority and/or you, the data subject, where legally required to do so.

8. Transferring personal data abroad

There may be circumstances in which we will have to transfer your personal data out of the European Economic Area for the purposes of carrying out the services we provide to you. Where the need for such a transfer arises, we will always ensure that there are appropriate safeguards in place to protect your personal data such as:

- the European Commission has issued a decision confirming that the country to which we transfer the personal data ensures an adequate level of protection for the data subjects' rights and freedoms;
- appropriate safeguards are in place such as binding corporate rules (BCR), standard contractual clauses approved by the European Commission, an approved code of conduct or a certification mechanism, a copy of which can be obtained from the Data Protection Officer; or
- the personal data is being transferred to a company in the US which has self-certified its compliance with the EU-US Privacy Shield which has been found by the European Commission to provide an adequate level of protection to the personal data of EU citizens.

9. How long will we retain your personal data?

We will only retain your personal data for as long as is necessary to fulfil the purposes for which we collected it and for as long as we are legally required to under EU or Irish law.

We subscribe to the National Retention Policy for Local Authority Records. We also maintain a Data Retention Policy which supplements the National Retention Policy.

Where you ask to be unsubscribed from marketing communications, we may keep a record of your email address and the fact that you have unsubscribed to ensure that you are not sent any further emails in the future.

10. Your rights as a data subject

Providing and holding personal information comes with significant rights on your part and significant obligations on ours. You have several rights in relation to how we use your information. If you make your request electronically, we will, where possible, provide the relevant information electronically unless you ask us otherwise:

The right to be informed

To know how your data is processed, stored, deleted and transferred

The right to access information

To access your information and to receive copies of the information we have about you.

The right to rectification

Request that inaccurate information is corrected, and incomplete information updated.

The right to be forgotten

Request that your data is erased if one of the following grounds applies: it's no longer necessary in relation to the purpose for which it was collected, your consent was withdrawn, you object to processing or the processing is unlawful.

Right to data portability

Obtain a transferable copy of certain data to which can be transferred to another provider, known as "the right to data portability".

This right applies where personal information is being processed based on consent or for performance of a contract and the processing is carried out by automated means. You are not able to obtain through the data portability right all of the personal information that you can obtain through the right of access. The right also permits the transfer of data directly to another provider where technically feasible. Therefore, depending on the technology involved, we may not be able to receive personal data transferred to us and we will not be responsible for the accuracy of same.

The right to object to the processing of personal data

Object to use of your personal data for direct marketing purposes. If you object to this use, we will stop using your data for direct marketing purposes.

Withdraw consent at any time, where any processing is based on consent. If you withdraw your consent, it will not affect the lawfulness of processing based on your consent before its withdrawal.

The right of restriction

Have your data deleted or its use restricted - you have a right to this under certain circumstances. For example, where you withdraw consent you gave us previously and there is no other legal basis for us to retain it, or where you object to our use of your personal information for particular legitimate business interests.

The right not to be subject to automated decision making, including profiling

Object to particular uses of your personal data where the legal basis for our use of your data is our legitimate business interests (for example, profiling we carry out for our legitimate business interests) or the performance of a task in the public interest. However, doing so may have an impact on the services and products we can / are willing to provide.

11. Requests to exercise your rights

If you have any questions about this policy or about our data protection compliance, please contact us.

Data subjects must make a formal request for personal data we hold about them or otherwise to exercise their data protection rights by contacting us. We provide sample letters, but you may make requests to exercise your rights in whatever way you please.

You will not usually have to pay a fee to access your personal data (or to exercise any of your other rights). However, we are entitled to charge a reasonable fee in circumstances where your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We will endeavour to respond to your requests within one month. If your request is particularly complex or if you have made numerous requests, it may take us longer to respond. If we anticipate that it will take us longer than one month to respond to your request, we will notify you of the delay and reasons for such delay.