

IDA Privacy Notice (Grant Applications & Claims) 13/11/2018

1. Background

This Data Protection Notice (“**Notice**”) sets out what personal data the Industrial Development Authority (“**IDA**”, “**we**”, or “**our**”) collects as part of the grant application and claiming/drawdown process and how this personal data is used. This personal data relates to individuals who are engaged by or are otherwise connected with companies that apply for or which have been awarded IDA grants (“**Applicant Companies**”).

IDA is a controller (as defined in applicable data protection law) of the personal data specified in this Notice.

2. How do we collect information from you?

The personal data we receive may be received either **directly** or **indirectly**.

- **Directly:** In some instances, you provide your personal data directly to us. For example, if you act as an authorised representative of the Applicant Company, you may provide your contact details to IDA when completing the grant application forms or when you correspond with us.
- **Indirectly:** In other cases we may receive your personal data from the Applicant Company as part of the grant process. For example, if you are a director of the Applicant Company, IDA will collect details of your other directorships and proof of identification. If you are employed by the Applicant Company under an IDA Employment Grant, IDA will collect your employee number and details of your salary.

3. What information do we collect and how do we use it?

The table below sets out the personal data which we may process may include some or all of the following, depending on the purpose of the processing:

Category of Data Subject	Types of personal data collected	Purpose
Authorised representative of Applicant Company responsible for submitting grant documentation.	Name Address Email Phone number	To contact you in relation to applications for grants and grant claims submitted. To send you marketing communications from time to time (see Marketing section below).
Directors of Applicant Company	Name Address Nationality Date of birth Directorships and shareholdings [Biographical information] Photos/video	To carry out due diligence on officers of Applicant Company.
Individuals engaged or otherwise connected with Applicant Company	Name Employee Number Salary Qualifications Job title	To verify eligible expenditure claimed by the relevant Applicant Company.

4. Marketing

If you are an authorised representative or officer of the Applicant Company, we may send you marketing communications by email. You can opt-out of receiving these marketing communications at any time.

5. Legal basis for processing

The following list details the legal bases according to which we collect, obtain and process your personal data.

Compliance with a legal obligation

We will process your personal data in order to comply with our legal obligations under the Industrial Development Acts 1986–2014 and Commission Regulation (EC) No. 651/2014 to assess grant applications and to process and manage the payment of grants.

In respect of your rights please see the section entitled “*What rights do you have?*” below.

6. With whom do we share your personal data?

We may disclose your personal data to any company or other corporate entity under the control and direction of IDA.

IDA is audited by external agencies including the Controller & Auditor General and the outsourced provider of internal audit services. Records containing personal data may be sought for review as part of audits undertaken.

We may disclose your personal data to third party suppliers who provide a service to us. 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 law.

We may also disclose your personal data in response to a valid, legally compliant request by a competent authority or in response to a court order or otherwise in compliance with the applicable law or to protect against the imminent harm to the rights, property or safety of IDA (Ireland).

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.

7. Where we store your personal data

Personal data submitted as part of a grant application or claim process is not transferred outside the EEA.

All information you provide to us is stored on our secure servers or in manual form.

8. Retention of personal data

Any information that you provide to us will be kept and stored for such period of time as we deem necessary taking into account the purpose for which it was collected in the first instance and our obligations under applicable law (including data protection law).

9. What rights do you have?

The list below sets out the rights which you have to address any concerns or queries with us about our processing of your personal data. Please note that these rights are not absolute and are subject to certain exemptions under applicable data protection law.

As a data subject, you have the following rights under data protection law:

- the right to know what personal data we process about you and how we use this personal data;
- the right to obtain a copy of the personal data we hold about you;
- the right to have any inaccurate personal data which we hold about you updated or corrected;
- where we rely on our legitimate interest to use your personal data, you have a right to object to this use. We will desist from processing your personal data unless we can demonstrate an overriding legitimate grounds for the continued processing of your personal data;
- the right to stop the IDA from using your personal data in certain cases, including if you believe that the personal data we hold about you is inaccurate or our use of your information 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; and
- in certain circumstances you may request that we delete the personal data which we hold about you.

10. Right to lodge a complaint with The Office of the Data Protection Commissioner

If you do not think that we have processed your personal data in accordance with this Notice, please contact us in the first instance. If you are not satisfied, you have the right to lodge a complaint with the Office of the Data Protection Commissioner (“**ODPC**”) or exercise any of your other rights pursuant to data protection law. Information about how to do this is available on the DPC website at <https://www.dataprotection.ie>.

11. Changes to this Notice

This Notice may be updated from time to time, so you may wish to check it each time you submit personal data to us. The date of the most recent revisions will appear on this Notice.

12. Legal information and how to contact us

If you need to contact us with regard to any of your rights as set out in this Notice, all such requests should be made in writing to The Data Protection Officer at IDA (Ireland), Wilton Park House, Wilton Place, Dublin 2, or by email to dpo@ida.ie.