

# Privacy Statement

Tourism Promotion and Development Services -  
Tourism Department, Clare County Council

Clare County Council is responsible for the provision of many important services in the administrative area of County Clare. These services include tourism development and promotion undertaken by its Tourism Department.

Clare County Council, whose principal place of business is at Áras Contae an Chláir New Road, Ennis, County Clare V95 DXP2 (also referred to as "Authority," "we," "our," "us") is the Data Controller when you provide your personal data to us.

The Tourism Department's role is to guide and support sustainable tourism in Clare through our County Clare Tourism Strategy 2030 – Guiding our Journey to a vibrant new future in Tourism. We will work collaboratively with tourism businesses, Local Government, State Agencies and Government Departments to deliver the County Clare Tourism Strategy.

Clare County Council fully respects your right to privacy. Clare County Council is committed to ensuring that your privacy is protected, and we wish to be transparent on how we process your data. Please read the following carefully to understand our views and practices regarding your personal data and how we treat it.

## Summary

This Privacy Statement relates to the personal data collected by us in respect to the services we provide – that is all tourism promotion and development services provided by the Tourism Department of Clare County Council.

It defines how we collect, share, store, our legal basis, how long we keep your data, and explain your rights. Any information that we process about you will be held in accordance with legislation.

## Legal Basis relied upon for collection, use and processing of personal data:

The legal basis relied upon is that processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Clare County Council may process personal data for the purpose of its functions under Section 63(1)(d), Section 66(4)(e) and Section 67(1) of the Local Government Act 2001 (as amended and updated by the Local Government Reform Act 2014) and to deliver on the targeted actions of various plans (e.g. the County Clare Tourism Strategy 2030, the Clare Rural Development Strategy, Clare Local and Economic and Community Plan, Clare County Development Plan 2017-2023 (as amended)). Such functions may include (but are not exhaustive to): Tourism promotion and development for County Clare.

A second legal basis of consent may be relied upon primarily for imagery (photography and videography) and voice recordings, and sign up for the e-newsletter via Mailerlite, where the data subject has given consent to the processing of his or her personal data for one or more specific purposes; The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

**What type of personal data do we process?**

Data includes an individual's name, contact details (address, telephone number, email address), IP address and in the case of grants, financial data such as bank account details will be processed to enable payments. We may collect PPSN numbers, VAT numbers, TAX numbers, but only where necessary for identification for tax purposes and payment. We may process names and images in photography and videography initiatives.

**Why do we collect this personal data?**

Personal data will be collected and processed by the Tourism Department of Clare County Council for the following purposes

- To facilitate Tourism promotion and development services to be delivered in accordance with the County Clare Tourism Strategy 2030, including our tourism website(s), social media, press, radio and tv promotions, tourism events/gatherings, tourism related-grant aid, meetings (online and virtual), photography, videography, audio and digital recordings.
- To engage with the tourism trade to collect, hold and, if deemed appropriate, to process this information, imagery (photography and videography), audio and digital recordings for tourism promotion and development purposes.
- We collect, hold and process personal data to allow efficient communication and correspondence with individuals and the tourism trade including name and email addresses of those who contribute information to us, and to make contact with them on an annual basis to ensure this information is kept up to date.
- We collect, hold and process personal data to allow efficient communication with those who have expressed an interest in receiving periodical tourism information (e.g. through a newsletter or other formats) including name and email addresses of those who have signed up.
- We collect, hold and process personal data for prize sharing purposes with those who have expressed an interest in submitting their feedback information for visitor surveys or for newsletter or tourism feature content including name and email addresses of those who have signed up.
- We collect, hold and process imagery (photographs, videography, audio and digital recordings) of the people we work with which we use to demonstrate our work and we also collect, hold and process images of lots of different types of people holidaying in Clare used to promote Clare as a tourist destination. We collect, hold and process aerial photography and videography, for example by using a drone, for promotional and development initiatives.
- We collect, hold and process personal data to prove consent for use of photographs/videos/audio and digital recordings (i.e. name, email address, phone number and signature).
- We process financial data (bank account details) in connection with the administration of tourism grant funding and invoice payments.
- We process PPSN numbers for identification for tax purposes and payment only where necessary.
- Clare County Council's tourism website(s) collect specific information automatically and stores it in log files. The information may include Internet Protocol (IP) addresses, the region or general location where your computer or device is accessing the internet, browser type, operating

system and other usage information about the use of Clare County Council's Visit Clare website, including a history of the pages you view. We use this information to help us design our site to suit our users' needs better. We may also use your IP address to help diagnose problems with our server and to administer our websites, analyses trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences.

- The Tourism Department's websites URLs is [www.visitclare.ie](http://www.visitclare.ie)
- Additionally, if you submit Personal Data relating to other people (e.g. photographs, creative stories) – such as your friends, family, colleagues and others for the purpose of tourism promotion and development – you are also deemed to be representing that you have the authority to do so and permit us to use their Personal Data for the purposes described in this Privacy Statement. Please note that by clicking accept on the Visit Clare Tourism Content System Contributor Agreement, you are agreeing to the terms set out.

#### **What we don't do**

- Link an IP address to anything personally identifiable.
- Share the information we track on our website(s), in any form with advertisers or other parties.
- We do not knowingly collect personal information from children without proper parental consent and we make every effort to ensure we have controls in place to secure the privacy of children. Individuals aged 16 or under must ensure they have parent/guardian's provide written permission before providing any personal information to us. If you believe that we may have collected personal information from someone under the age of 16 without parental permission, please let us by contacting us at [tourism@clarecoco.ie](mailto:tourism@clarecoco.ie) and we will investigate and address the issue promptly.

#### **Retaining your data**

We will only store personal data for as long as necessary for the purposes for which it was obtained. The criteria used to determine our retention periods include:

- (i) The length of time we have an ongoing relationship and/or provide our services
- (ii) Whether there is a legal requirement to which we are subject and
- (iii) Whether the retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

The Council subscribes to the national records retention policy for local authorities. We will keep personal data contained in grant application files in line with our Retention Schedule. It will be retained in a secure environment in the Tourism Department and access to it be restricted to Tourism staff.

Upon request, we will remove any subscriber (and his or her personal information) from our subscribers lists. Any such request should be directed [tourism@clarecoco.ie](mailto:tourism@clarecoco.ie)

#### **Sharing your data**

To provide our services and to comply with legal obligations imposed on us, it may be necessary from time to time for us to disclose personal data to third parties, who help us administer and audit our services:

- Marketing Services Company (name, address, email, telephone number, photography, videos, audio and digital recordings)
- Hosting service provider (IP address of visitors to tourism website(s) and Cookies)

- Finance Section (supplier setup information including name, address, bank details, and occasionally PPSN number, VAT number and Tax number to facilitate identification for tax purposes and payment).
- Fáilte Ireland (name, address, email, telephone number, photography, videos, audio and digital recordings, grant reports).
- Department of Rural & Community, Waterways Ireland, Office of Public works (name, address, email, telephone number, photography, videos, audio and digital recordings, grant reports).
- For Videography and Photography - Fáilte Ireland, Tourism Ireland, Clare Tourist Trade, Clare Tourism Advisory Forum, Shannon Region Sports and Conference Bureau, World Travel Trade and National and International media in the context of this promotional campaign for Clare tourism or partnering State Agencies (such as Waterways Ireland, Office of Public Works, respective Government Department).

Where we need to share your personal information, we will do so in line with this Statement and our legal obligations, including ensuring that the third party we are sharing it with has appropriate technical and organisational measures and processes in place to keep your personal information secure, and that they only use it in accordance with our instructions.

### Your rights

**Right of access** – you have the right to request a copy of the information that we hold about you.

**Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.

**Right of erasure** – in certain circumstances, you can ask for the data we hold about you to be erased from our records.

**Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing.

**Right to portability** – subject to certain restrictions, you have the right to have the data we hold about you transferred to another organisation where we hold it in electronic form.

**Right to object** – you have the right to object to certain types of processing such as, direct marketing.

Further information about exercising your data rights is available at the following link: [Data protection | How we manage information | Council | Clare County Council \(clarecoco.ie\)](#)

### How do we protect your information?

Clare County Council will take appropriate legal, organisational and technical measures to protect your personal information. Clare County Council takes every reasonable measure and precaution to protect and secure your personal data against unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including:

- SSL;
- Restricted Access;
- IT Authentication;
- Firewalls; &
- Anti-Virus/Malware
- Locked cabinets in Tourism Department.

### Where the data subject does not provide their personal data

If we cannot collect or process certain personal data, we may not be able to provide a grant or other supports or services. If you have any queries in respect of the consequences of not providing information, please contact us (see the section Complaints, Questions and Assistance).

### **Changes to our privacy statement**

We reserve the right to modify this Privacy Statement at any time.

If we change our privacy policy, we will post the changes on this webpage and may place notices on other pages of the website so that you may be aware of the information we collect and how we use it at all times. Continued use of the service would signify that you agree to any such changes.

This privacy statement was last updated in April 2023.

### **Complaints, questions and assistance**

If you have any comments, concerns or complaints about our use of your personal data, we ask that you contact us first to try and resolve the matter.

You are encouraged to raise any issues with our Data Protection Officer:

Post:

Data Protection Officer, Finance and Support Services Directorate, Clare County Council, Áras Contae an Chláir, New Road, Ennis, Co. Clare V95 DXP2, Telephone number: (065) 6846405 or (065) 6846200, email: [dpa@clarecoco.ie](mailto:dpa@clarecoco.ie)

Or

Clare County Council's Tourism Department contact details: Clare County Council, Áras an Contae and Chláir, New Road, Ennis, Co Clare V95 DXP2, telephone number: (065) 6821616

E-mail:

[tourism@clarecoco.ie](mailto:tourism@clarecoco.ie)

### **Complaining to the Data Protection Commission (DPC)**

If you wish to make a complaint about how Clare County Council processes your personal data or how your complaint has been handled, you have the right to lodge a complaint directly with the Data Protection Commission (DPC) or to the Statutory Authority in your country of residence, who will be able to liaise with the DPC.

The Data Protection Commission can be contacted at:

Post: Data Protection Commission (DPC), Canal House, Station House, Portarlington, Co. Louth.

Telephone: +353 (0) 57 8684800

Telephone: +353 (0) 76 1104800

Lo-Call Number: 1890 252 231

E-mail: [info@dataprotection.ie](mailto:info@dataprotection.ie)