

## **ICBF Privacy Policy**

At ICBF, we take the protection of your data seriously. We want you to feel confident that we are keeping your data secure, and that we handle and process it in accordance with the European General Data Protection Regulation ((EU) 2016/679) or Data Protection Act 1988 to 2003.

In our privacy policy we explain what personal data we collect, how we collect it, what we use your data for and how we safeguard it.

## My data

### What data do you collect?

We want to give our customers the best possible experience. To do so, we need to collect personal data from you for certain processes such as providing a service and when you enquire about our services. "Personal Data" means data which relates to a living individual who is or can be identified either from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller.

The data we collect may include:

- Personal information such as name, address, email, phone, mobile and other contact details.
- If you are a buying our products or services we will collect your credit or debit card information and in the case of direct debit we will require your bank account number and sort code.
- When you contact us through our call centre (call recordings) or through web (email) or any feedback you've given us through our website or apps including customer support. This may be used for training and operational compliance.
- When you visit our websites, or use our apps we collect device information such as the IP address of your device, your device model and its settings and network information.
- Cookies on the ICBF website that help us provide you a tailored experience. Please refer to the cookies section within this Privacy Policy for more information on what cookies we use and how we use them.
- Your marketing preferences that you provide when you sign up for our products and services.
- The type of products and services you have including your contract type and all information to do with your payments.
- Data about your communications such as the date and time of calls/texts you have made to or received from
- Data that we receive from Third Parties where you have given them permission to share your data with us.

### Where we collect data:

We typically ask you for personal details when you sign our authorisation form, authorise through DAFM, when you sign up for our services through our call centre, when you order online, order in person, register for any of our apps, or visit our websites.

## How do you use the data I provide?

Primarily we use the data we collect and hold on our database to ensure we are providing you with highly relevant content, products and services that meet your specific needs, and to deliver more efficient herd management.

Here are some other ways in which we use this data:

- For managing the member's membership with the ICBF.
- To provide cattle breeding information services to the Irish dairy and beef industries on a collective and individual basis.
- In order to identify and create a profile of animals automatically by synchronizing with the department of agriculture's AIM system. This allows us to automatically add new born/moved in animals and to remove dead/sold animals from a member's profile. This is how we keep members profiles current.
- To help us refine our products and services.
- To make sure we are only sending you communications about products and services that you've shown an interest in.
- To keep you updated on any changes to your services, and to advise you on how you can get the best out of our services and products.
- To enhance our customer support by analysing your interactions with us.
- We will process your data to help us present appropriate offers to you in the form of relevant personalised communications based on your interests and characteristics.

- So that we can investigate, prevent or act regarding illegal activities and violations of our Terms of Service and/or applicable law.
- To meet our legal and regulatory obligations.
- In many cases we aggregate and/or anonymise your personal information so that it no longer identifies you.
- In certain circumstances we will be required to send data outside the EEA

## What about third parties?

### Who do you share my data with and why?

There are a number of reasons why we would share your data with third parties. Be assured we always look to safeguard your data.

Here is a list of instances in which we share your data, and the third parties to whom we share it with.

- Organisations to whom you have authorised us.
- Organisations with whom a contract exists.
- Organisations who work on ICBF behalf to provide you with products and services, for example, call centre.
- If you have opted in for marketing or have requested to be marketed by third parties under our service.
- If we are required by any relevant public authority or law enforcement agency under legal obligations.
- Where a legitimate interest exists.

### How long do you keep my personal data?

This depends on the type of data and how we use it. When we decide on what data to keep we consider the information we need to best provide you with our products and services, to help us manage your relationship with us, and to make sure we can meet certain statutory obligations. When your data is no longer necessary we delete your data.

### How do you secure my data?

At ICBF, securing your personal data is extremely important to us, which is why we take appropriate measures to protect your data. We use a range of security technologies and processes, and actively monitor emerging cyber threats on a 24 x 7 basis. We regularly audit our systems and processes.

#### Data Protection Principles:

The Data Protection Requirements require personal data to be processed in accordance with certain principles which require such data to be:

- obtained and processed fairly and lawfully;
- kept only for one or more specified and lawful purposes;
- processed only in ways compatible with these purposes;
- kept safe and secure;
- kept accurate and up to date;
- adequate, relevant and not excessive;
- not retained for longer than is necessary for the specified purpose or the purposes;
- given to an individual, on request.

### Privacy-by-design and by Privacy-by-default

We seek to ensure that privacy is built into our products and services by design. We conduct a privacy and legal impact assessment for all new products and services, together with an analysis of any associated data processing activity such as billing. These impact assessments are conducted by the relevant expert teams.

# Controlling my data

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### How can I take control of my personal data?

The good news is you have ultimate control over your personal data. If you don't want us to send you relevant offers or marketing information you can opt out at any time.

Here are the quick and simple ways you can opt out:

- Call our customer service team:
- o 023 88 20 222
- Edit your preferences on my profile

You can also opt out using the link at the bottom of any marketing email or by texting STOP to any text you receive from us.

### What communications will we always send you?

We make it easy for you to opt-out of marketing information and offers. However, we want to make sure you are kept up to date on all information relevant to your account. That's why you cannot opt out of receiving messages related to billing, usage or general service messages.

### How can I access my data?

If you want to get a copy of your personal data we hold, simply print out <u>this form</u> – also known as a Subject Access Request (SAR) and send it to us by post to:

FAO: Data Protection ICBF Highfield House Shinagh Bandon Co. Cork P72 X050 or email the completed form to dpo@icbf.com

### Any other questions on your data?

• Call our customer service team: • 023 88 20 222

You also have the right to take any complaints about how we process your personal data to the Data Protection Commissioner:

Web: https://www.dataprotection.ie/ Telephone: +353 57 8684800 or +353 (0)761 104 800 Email: info@dataprotection.ie Address: Data Protection Commissioner Canal House Station Road Portarlington R32 AP23 Co. Laois

### What are cookies?

### What are cookies and how do you use them?

Cookies are small files that are stored on your computer when you visit our websites. The cookies hold basic information that shows us if you have visited our site previously, and which pages you visited. This data helps us to provide you with a more personalised service, so for example, the next time you visit our site we can present you with product or service information that you've shown an interest in.

#### How do you collect data from cookies?

We collect data in a way which does not identify you. We will not associate any data gathered from our website with any personally identifying information from any other source.

This web page (Our cookies) gives you a breakdown of what cookies are used on each of our sites.

Please note: We are very clear about collecting personally identifiable data on our website. We will always ask you if we need this information and what we need it for.

### Can I enable or disable cookies?

Today most web browsers allow you some control over whether you allow cookies to be collected. You can also easily delete or clear cookies on your browser at any time.

This is a handy guide <u>www.allaboutcookies.org</u> about cookies, which shows you how to see what cookies have been set on your browser and how you can manage them.

### What if the privacy policy changes?

We will occasionally update this privacy policy. We encourage you to periodically review this notice to be informed of how we use your information.

This Privacy Policy is effective from 25<sup>th</sup> of May 2018.