

## Privacy Policy

This is the Privacy Policy of Sustainability Matters CLG t/a Sustainable Nation Ireland of Talent Garden Dublin, Claremont Avenue, Glasnevin, Dublin 11, D11 YNR2 Ireland.

The purpose of this Privacy Policy is to ensure individuals and data subjects understand how we process their information.

Sustainable Nation Ireland endeavours to comply with the General Data Protection Regulation, Data Protection Act 2018 and data protection best practices.

We process personal data provided to us by individuals, whether it be provided in person, through our website ([www.sustainablenation.ie](http://www.sustainablenation.ie)), any mobile/app service or any form, correspondence, telephone, email, any event we organise such as Climate Finance Week ([www.climatefinaceweek.ie](http://www.climatefinaceweek.ie)), or by any other means, or otherwise processed by us in relation to you, in the manner set out in this policy.

By submitting your information to us, and or engaging with our services or events and or by using the Website you consent to the use of your personal information as set out by this Privacy Policy. If you do not agree with the terms of this Privacy Policy please do not use the Website, our services, engage with any event or provide us with any personal information or personal data.

Sustainable Nation Ireland acts as a data controller in the provision of our services including the running, hosting and management of events.

### Information collected by us

The information about you that we may collect, use and store (process) includes:

- Information necessary for the provision of services to you of which such data may include name, address, email address, contact details, etc.
- Information necessary in order to facilitate, process, invoice or collect monies related to any agreed business transaction with Sustainable Nation Ireland (of which such data may include name, address, contact details, billing details, etc.).
- Information you provide to us by filling out any forms on the website or by way of emailing us or by any other form of written communication.
- Records of correspondences whether by email, telephone, through any form on our website or by any other means,
- Information you provide to us in person,
- Details of any business, commercial or trade transactions you carry out with us, whether through email, the website, telephone, or by any other means.
- Details of your visits to our website including traffic data, location data, weblogs and other communication data in accordance with our **Cookie Policy** that may identify personal information (e.g. cookies) and non-personal information (e.g. information of an anonymised or technical nature).

- If requested by you, details of any ‘reasonable accommodation’ required and or data relating to health and or mobility issues that you volunteer so we can provide ‘reasonable accommodation’ to you under the Equality Acts and or Employment Equality Acts.

We do not process any special categories of personal data (except for where a request of ‘reasonable accommodation’ is made) nor do we process any children’s personal data.

## How we use your personal information

Sustainable Nation Ireland is a not-for-profit non-governmental organisation that advocates and promotes sustainable finance and responsible investing. On occasion we also run events such as Climate Finance Week ([www.climatefinaceweek.ie](http://www.climatefinaceweek.ie)) in which guests and speakers network, promote and support our goals.

We only use your personal information in furtherance of our goals but, in accordance with good data protection practices, we process personal for the following specific purposes:

- i. Processing any enquiry requested by you;
- ii. Entering into and or completing any sales commercial or business-related requests or transactions requested by you;
- iii. Complying with any contractual obligations relating to any accountancy and or payroll agreement that you may enter into;
- iv. Setting up, operating and managing any account or line of credit, if applicable;
- v. Setting up, operating and managing any marketing and or advertising services subject to your explicit consent (please see **Marketing & Advertising below**);
- vi. Complying with our legal duties and responsibilities;
- vii. Debt collection and the collection of outstanding monies;
- viii. Providing, monitoring, reviewing and supporting our online presence via our website and social media (please see our **Cookie Policy**)
- ix. Protecting our vital interests under the circumstances.
- x. Protecting our legitimate interests under the circumstances.

As a data controller, we obtain consent to process personal data by way of notification on our website that requires an explicit acceptance of this Privacy Policy and associated Cookie Policy to use the website. Consent for data processing purposes can also be obtained by way of a physical application form, credit form or other paperwork that refers to our privacy policy on this website and acceptance of same.

For example, anyone who may wish to engage in our services will have to do so by email or fill out a form for services. As part of this process, there is a mechanism for people to consent to the processing of their personal data in accordance with this Privacy Policy.

## Data Retention

All data processed will be held as confidential, secure, will be used only for the purposes for which it was collected and will be destroyed or deleted once it is no longer necessary in accordance with our data retention policy. Our standard data retention period is seven years.

We have a reduced data retention period for specified documents that is internal to our company, e.g. the CVs of unsuccessful job applicants are held by the company for six months and are then deleted or destroyed in a secure manner.

### **Automated Decision Making**

Sustainable Nation Ireland does not engage in any automated decision-making processes nor do we use any personal data as a basis for any such automated decisions.

### **Data Sharing & Transfers of Data**

Sustainable Nation Ireland may outsource certain business activities (e.g. debt-collection, legal advice, back up services, IT support, etc.) to third parties.

If we share personal data in our capacity as a data controller then we will have in place a proper data processing agreement with the data processor (e.g. lawyers, accountants, etc.) to ensure ongoing compliance with GDPR and the Data Protection Act 2018.

We may also have to disclose certain personal data to the data controller in order to ensure the data controller complies with a legal obligation (e.g. court order, child protection concerns, etc.).

We may also have to disclose certain personal data in accordance with any legal obligation imposed on us. Any such disclosure would be in accordance with the law, e.g. disclosed on foot of a court order, child protection concerns, etc.

Sustainable Nation transfers personal data to the following locations:

#### **1. Within the EU**

We engaged with EU based third-party contractors for the provision of some of our services or business activities (e.g. marketing of certain events, ticketing service provider, etc.). These contractors are primarily based in Ireland, but we may use other EU based service providers.

In the event that we use any EU based service providers then we use the Data Protection Commission's One Stop Shop Mechanism that permits inter-EU data transfers and have identified the Irish Data Protection Commission as the proper supervisory authority for all data protection matters.

## 2 Outside of the EU

In our capacity as a data controller, we may outsource certain business activities to businesses outside the EU and in particular to the United States. In such cases we ensure that GDPR protections still apply to all data by various mechanisms as identified under Chapter 5 of GDPR, including but not limited to, EU-US Privacy Shield, Binding Corporate Rules, Standard Contractual Clauses and Adequacy Decisions. As such, your rights under GDPR are maintained and your personal data remains secure.

For example, if you give us your explicit consent, we may use Mailchimp to send you marketing emails but Mailchimp uses Standard Contractual Clauses and has an EU-US Privacy Shield Framework in place to ensure GDPR compliance. For Mailchimp's data protection practices please see their privacy policy available at [www.mailchimp.com/legal/privacy](http://www.mailchimp.com/legal/privacy).

For more information about international transfers of data, the One Stop Shop Mechanism, EU-US Privacy Shield, Binding Corporate Rules, Standard Contractual Clauses and Adequacy Decisions, please visit the Irish Data Protection Commission's website at [www.dataprotection.ie](http://www.dataprotection.ie).

### Data Processing Agreements

We have appropriate data processing agreements and or terms of business in place where we engage with a data processor in our capacity as a data controller.

For more information on appropriate data processing agreements, please visit the Data Protection Commission's website at [www.dataprotection.ie](http://www.dataprotection.ie).

### Marketing & Advertising

We may, from time-to-time, engage in marketing and or advertising campaigns, and we may use promotional emails, text messages and or phone calls to people who have consented to being contacted for marketing and advertising purposes.

In terms of data processing, subject to your **explicit consent**, we may use your personal information for the purpose of:

- i. Marketing and Advertising promotions;
- ii. Providing you with information about our products and services;
- iii. Carrying out any service user, membership or volunteer research, survey and analysis;
- iv. Commercial activities, including brand or event awareness, participation and product or service launches;

At some interactions with us you may be asked to consent to your data being used for marketing purposes. In such cases, consent will require positive action on your part. For example, on an enquiry form you would have to tick a box stating that you consent to your data being processed for marketing and advertising purposes in accordance with this privacy policy in order to receive personalised targeted marketing emails, text messages and or phone calls.

At times, we may host or organise events in which data subjects may interact with us face-to-face, e.g. at trade shows, talks, presentations, etc. In such cases, we may verbally ask if you consent to your data being processed for marketing and advertising purposes subject to this policy. We may also announce that photographs may be taken for social media purposes but please refer to the social media section below.

We may use Mailchimp for our email marketing who are GDPR compliant by way of an EU-US Privacy Shield. Please note that if you do not consent to your email being used for marketing purposes then we do not contact you by email for marketing or advertising purposes and the privacy shield stated here is not applicable. For more information on Privacy Shield please see the Data Protection Commission's website [www.dataprotection.ie](http://www.dataprotection.ie) and Mailchimp at <https://mailchimp.com/help/about-mailchimp-the-eu-swiss-privacy-shield-and-the-gdpr/>

We are committed to privacy by design and privacy by default. As such, you will never have to 'opt-out' of our marketing processes; you will only ever have the option of 'opting in' if you'd like to be included. We do not engage in 'pre-ticked' boxes on consent forms nor do we ever assume you would consent to your data being processed. You are free to withdraw consent for any marketing matters at any time you want.

## **Social media**

Sustainable Nation Ireland engages in a number of social media services and we strive to uphold privacy rights online. We use social media services to promote our company and also to promote our specific events such as Climate Finance Week ([www.climatefinaceweek.ie](http://www.climatefinaceweek.ie)).

Whilst engaging with social media, sometimes members of the public may post something objectionable and beyond our control to our social media pages/forums. In such cases, we will act to rectify any difficulties as soon as we are notified or become aware of the problem. We do not provide a continuous monitoring of social media sites/forums so there may be a slight delay from the initial post to when become aware of a problem.

We may hold marketing and fundraising events in which service users, clients, visitors, third-party contractors, employees or members of the public may be present. Sometimes we may wish to take a photograph at such events to promote our brand or event on social media. In such cases, it is our policy for our photographer/social media handler to announce their presence and provide additional instructions and assistance. However, we do not have any control over private individuals or their personal social media accounts, as such we

cannot stop or prevent private individuals from posting materials to their own personal social media accounts that others may find objectionable.

For information relating to social media usages, cookies or widgets, please see our ***Cookie Policy***

We welcome enquires and communications from clients and prospective clients through social media however users are bound by the privacy policy of the respective social media organisation (e.g. Facebook, LinkedIn, etc.). We cannot be held liable for any act or omission of the social media organisation nor can we ensure that any communication through social media is encrypted or secure in anyway.

### **Information Storage**

We will take reasonable steps to ensure that your information is kept secure and protected, including but not limited to electronic data being protected using appropriate software, relevant networks safety and security checks, where applicable, to include two-step authentication, and, where applicable, any physical data records will be kept in an appropriately secure environment with physical locks and restricted access.

We have a general data retention policy that relates to the retention of relevant data for seven years, but we identify specific categories of personal data that are retained for lesser periods. Personal data that is no longer required will be destroyed and or deleted in secure manner.

We do not record or process personal data that is not required or not necessary for any of our stated purposes.

### **Requesting your data**

Any person has the right to find out whether an organisation has any personal data about them, what they use the personal data for and ask for copies of personal information held by that organisation.

If you wish to make a data access request in order to get a copy of any personal data we may process, please write a letter stating that you wish to make a data access request and address it to:

Data Protection  
Sustainable Nation Ireland  
Talent Garden Dublin  
Glasnevin  
Dublin 11  
D11 YNR2

Or by email to [info@sustainablenation.ie](mailto:info@sustainablenation.ie)

In order to process your request, we may request that you send us a copy of your identification (passport, driver's licence, etc.). The reason we ask for personal identification is to ensure that you are the correct person making the request for your personal data.

Unfortunately, verbal access requests cannot be entertained.

In response to any data access request, you have the right to refer the matter to the Data Protection Commission if you are unhappy with the outcome, however, we ask that you notify us first of any issue so that we may help resolve it as quickly as possible.

### **Rectifying mistakes**

You have the right to rectify any incorrect or inaccurate personal data at no cost to you.

If you believe that we are incorrectly processing any of your personal data, please inform us by writing to the above address or email [info@sustainablenation.ie](mailto:info@sustainablenation.ie)

### **Queries or complaints**

If you have any queries or complaints regarding our Privacy Policy or any data protection matter, please let us know by writing to the above address or email [info@sustainablenation.ie](mailto:info@sustainablenation.ie)

Individuals have the right to refer any matter to the Data Protection Commission by contacting them at [www.dataprotection.ie](http://www.dataprotection.ie) or by writing to:

Data Protection Commission  
Office of the Data Protection Commission  
21 Fitzwilliam Square South  
Dublin 2  
D02 RD28  
Ireland

If you are, for whatever reason, considering contacting the Data Protection Commission about us we would ask that you inform us of your difficulty first so that we can try to resolve it to your satisfaction.

### **Changes to our Privacy Policy**

Any changes we may make to our Privacy Policy in the future will be posted on our website.

Any changes will become effective upon posting the revised Privacy Policy on our website. If we make any material or substantial changes to this Privacy Policy, we will use reasonable

endeavours to inform you by email, notice on the Website or any other agreed communications channels.

*Privacy Policy last reviewed: May 2020*

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[www.argentbusinessconsultants.ie](http://www.argentbusinessconsultants.ie)

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