**Privacy Notice**

**DATA PROTECTION PRIVACY NOTICE – FOR NON-CCCI USERS**

**1. Notice statement**

Central Copy Clearance Ireland, trading as CopyClear, (CCCI) established 12 Clanwilliam Square, Grand Canal Dock, Dublin 2 (hereafter “**CCCI**” or the “Company”) has prepared this data protection notice (the “Notice”) to describe its practices regarding the collection, use, storage, transfer and other processing of individually identifiable information about you (“**Personal Data**“).  The Company is the controller responsible for the processing of Personal Data described in this Notice.

**2. What personal data we collect and how we use it**

**2.1 Legal basis**

The processing of your Personal Data described in this Notice is based on your consent.

**2.2 What personal data we collect and use**

The categories of Personal Data that the Company processes are:

* **Personal details and contact information:** this includes without limitation name and surname, e-mail and telephone details, work address, job title and in some instances, a photograph.

**2.3 How we use personal data**

Except where restricted by Irish law, the Company uses the Personal Data listed above for the following purposes.

* **Communications:** Sending invitations and communications related to CCCI events, as well as relevant CCCI publications and CCCI news*.*
* **Communications**: Responding to user submissions, agencies and brand owners, telephone conversations and meetings with users.

**3. How we store personal data and who can access it**

The Company maintains an automated record of your Personal Data.  Additionally, the Company maintains Personal Data in various digital documents, namely event attendee lists and meeting score records.

The persons and entities that can have access to your Personal Data are:

* IAPI staff based in the office in Dublin, 12 Clanwilliam Square, Grand Canal Dock, Dublin 2.
* AAI staff based in the office in Dublin, Denshaw House, 120-121 Lr Baggot Street, Dublin 2
* ABFI staff based in the office in Dublin, 84/86 Lower Baggot Street, Dublin 2
* Consultants who are hired as independent contractors as clearance monitors primarily based in the offices of IAPI, 12 Clanwilliam Square, Grand Canal Dock, Dublin 2 and also from their business addresses as highlighted in their contracts
* External professional services, such as IT systems services.

Where the Company engages a third-party processor to process Personal Data on its behalf, such as those listed above, the Company will delegate such processing in writing, will choose a processor that provides sufficient guarantees with respect to technical and organisational security measures governing the relevant processing, and will obligate the processor to act on the Company’s behalf and under the Company’s instructions.  In addition, the Company will impose in writing appropriate data protection and information security requirements on such third-party processors.

From time to time, the Company may also need to disclose Personal Data to other parties, such as any organisation with whom the Company co-organises an event. The Company may share Personal Data with these third parties when it is necessary for the purposes of the legitimate interests pursued by the Company.

**4. Security**

The Company maintains appropriate technical and organisational measures to protect against unauthorised or unlawful processing of Personal Data and/or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage to Personal Data.  These measures are aimed at ensuring the on-going integrity and confidentiality of Personal Data.  The Company evaluates these measures on a regular basis to ensure the security of the processing.

**5. Data retention**

The Company will retain your Personal Data for a period of 6 years unless you withdraw your consent to the processing of your Personal Data earlier. The Company will retain your Personal Data in accordance with applicable legal requirements, and only for as long as necessary for the purposes described in this Notice or as long as required by law or to defend potential legal claims.

**6. Your rights**

You have the right to withdraw your consent to the processing of your Personal Data at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

To the extent required by applicable law, you have the right to: i) have access to your Personal Data; ii) the right to have inaccurate data corrected or removed, iii) the right to object to the processing of your Personal Data; (iv) the right to restrict the Company’s use of your Personal Data; (v) the right to receive your Personal Data in a usable electronic format and transmit it to a third party (right to “data portability”); and (vi) the right to lodge a complaint with their local data protection authority.

In particular, the Company is committed to working with you to obtain a fair resolution of any complaint or concerns about privacy.  If, however, you believe that the Company has not been able to assist with your complaint or concern, you have the right to make a complaint with the competent authority of the EU Member State where you reside or work or where you believe that your rights have been infringed.

If you have any questions regarding this Notice or you want to exercise your rights please contact **clearance@copyclear.ie**

**7. Notice updates**

In case of any material changes to the way in which the Company collects or uses Personal Data, the type of Personal Data it collects or any other aspect of this Notice, the Company will issue a revised Notice.

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**DATA PROTECTION PRIVACY NOTICE – FOR CCCI USERS**

**1. Notice statement**

Central Copy Clearance Ireland trading as CopyClear (CCCI) established 12 Clanwilliam Square, Grand Canal Dock, Dublin 2 (hereafter “**CCCI”** or the “Company”) has prepared this data protection notice (the “Notice”) to describe its practices regarding the collection, use, storage, transfer and other processing of individually identifiable information about you (“**Personal Data**“).  The Company is the controller responsible for the processing of Personal Data described in this Notice.

**2. What personal data we collect and how we use it**

**2.1 Legal basis**

The processing of your Personal Data described in this Notice is necessary for the purposes of the following legitimate interests pursued by the Company entering into a contract with applicant CCCI Member organisations and providing the services to which CCCI Members Organisations are entitled.

CCCI processes your Personal Data in your quality of contact person designated by one of our applicant CCCI User Organisations or one of our CCCI User Organisations.

**2.2 What personal data we collect and use**

The categories of Personal Data that the Company processes are:

* **Personal details and contact information:** this includes without limitation name and surname, e-mail and telephone details, work address, job title, and in some instances, a photograph.

**2.3 How we use personal data**

Except where restricted by Irish law, the Company uses the Personal Data listed above for the following purposes.

In particular, the Company uses your Personal Data for complying with its contractual obligations related to:

* **Entering into a contract with new CCCI User Organisations:** CCCI processes the Personal Data of applicant CCCI User Organisations’ contact persons for the purpose of entering into a contract with the respective applicant CCCI User Organisation;
* **Communications:** upon your CCCI User Organisation joining the CCCI’s network and based on your job title, you will be added to different relevant working groups and their contact lists, as well as to the relevant CCCI Bulletins/Newsletters. On the basis of this, CCCI will be sending invitations to meetings, meeting minutes, requests to fill out surveys and communications related to CCCI events and working groups, as well as CCCI publications and the relevant CCCI Bulletins and Newsletters.

**3. How we store personal data and who can access it**

The Company maintains an automated record of each User’s Personal Data.  This automated record contains most of the data held in the User’s file.  Additionally, the Company maintains Personal Data in various digital documents, namely event attendee lists and meeting score records.

The persons and entities that can have access to your Personal Data are:

* IAPI staff based in the office in Dublin, 12 Clanwilliam Square, Grand Canal Dock, Dublin 2.
* AAI staff based in the office in Dublin, Denshaw House, 120-121 Lr Baggot Street, Dublin 2
* ABFI staff based in the office in Dublin, 84/86 Lower Baggot Street, Dublin 2
* Consultants who are hired as independent contractors as clearance monitors primarily based in the offices of IAPI, 12 Clanwilliam Square, Grand Canal Dock, Dublin 2 and also from their business addresses as highlighted in their contracts
* External professional services, such as IT systems services.

Where the Company engages a third party processor to process Personal Data on its behalf, such as those listed above, the Company will delegate such processing in writing, will choose a processor that provides sufficient guarantees with respect to technical and organisational security measures governing the relevant processing, and will obligate the processor to act on the Company’s behalf and under the Company’s instructions.  In addition, the Company will impose in writing appropriate data protection and information security requirements on such third-party processors.

From time to time, the Company may also need to disclose Personal Data to other parties, such as any organisation with whom the Company co-organises an event. The Company may share Personal Data with these third parties when it is necessary for the purposes of the legitimate interests pursued by the Company as described in this Notice.

**4. Security**

The Company maintains appropriate technical and organisational measures to protect against unauthorised or unlawful processing of Personal Data and/or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage to Personal Data.  These measures are aimed at ensuring the on-going integrity and confidentiality of Personal Data.  The Company evaluates these measures on a regular basis to ensure the security of the processing.

**5. Data retention**

The Company will retain your Personal Data for the duration of the contract and 6 years thereafter with the respective CCCI User Organisation in accordance with applicable legal requirements, and thereafter move you on to the non-user communications list unless you advise a wish to unsubscribe from communications altogether. If you wish to obtain additional information concerning the duration of the contract between CCCI and your CCCI User Organisation please contact clearance@copyclear.ie

**6. Your rights**

To the extent required by applicable law, you have the right to: i) have access to your Personal Data; ii) the right to have inaccurate data corrected or removed, iii) the right to object to the processing of your Personal Data; (iv) the right to restrict the Company’s use of your Personal Data; (v) the right to receive your Personal Data in a usable electronic format and transmit it to a third party (right to “data portability”); and (vi) the right to lodge a complaint with their local data protection authority.

In particular, the Company is committed to working with you to obtain a fair resolution of any complaint or concerns about privacy.  If, however, you believe that the Company has not been able to assist with your complaint or concern, you have the right to make a complaint with the competent authority of the EU Member State where you reside or work or where you believe that your rights have been infringed.

If you have any questions regarding this Notice or you want to exercise your rights please contact clearance@copyclear.ie

**7. Notice updates**

In case of any material changes to the way in which the Company collects or uses Personal Data, the type of Personal Data it collects or any other aspect of this Notice, the Company will issue a revised Notice.

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**PRIVACY NOTICE – FOR WEBSITE USERS**

**Scope of application**

You are now connected to the official web site (“this site”) of Central Copy Clearance Ireland (CCCI). CCCI maintains this site to enable public visitors (“visitors”) and registered-users to access information about its activities and initiatives.

This privacy policy applies to all visitors and registered users entering this site (“you”), regardless of the physical location of the individual accessing user. By entering this site you are expressly accepting the conditions outlined below. Please note that this privacy policy may be changed and/or amended from time to time and that by re-entering this site you will accept those changed or amended clauses of the privacy policy at the time of re-entry. This privacy policy does not apply to external sites accessible from links offered on this site.

**Collection, use and processing of personal data**

Visitors and registered users are not obliged to enter their personal data on this site.

**Disclosure to third parties/transfer of personal data abroad**

Your personal data might be disclosed with CCCI’s contractual partners, who have access to your data in order to provide services to CCCI (e.g. its online domain/website hosting supplier, its database software supplier). CCCI does not disclose or share any personal data about you collected on this site with other entities without prejudice to any statutory obligation to do so by law, official or court orders.

Your personal data are not transferred to any non-EU country.

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**IP addresses and Cookies**

**IP addresses**

When visiting this site, visitors’ and registered users’ IP addresses are automatically collected by CCCI for system administration and statistical purposes in order to optimize the user experience of this site.

Depending on the circumstances, collected IP address data may allow conclusions to be drawn about users’ interaction with this site. However, CCCI does not combine IP addresses with other information on the users and cannot relate IP addresses with the identity of the user. CCCI solely use IP addresses as such and is not able to identify specific users by way of IP addresses.

Your IP address is logged when visiting our site, but our analytic software only uses this information to track how many visitors we have.

**“Cookies”**

Provided that you have accepted the use of cookies, CCCI will use the “cookies” to facilitate the use of this site. Cookies are bits of text that are placed on your computer’s hard drive when you visit certain websites. CCCI uses first-party cookies to retain registered users’ passwords so that the log-on process is simpler and hassle-free. The cookies that CCCI uses are session/temporary cookies with short-term future expiration dates.

As part of Google Analytics, CCCI also uses first-party cookies to monitor traffic to this site. The purpose of these cookies is to understand – at an anonymous, statistical level – who our site visitors are, what brings them to the site and what use they make of it. The longest cookie lifespan of these cookies is 2 years.

In addition, you can learn more about controlling the cookies that may be placed in the following web browsers or applications: [Chrome](http://www.google.com/chrome/intl/en/more/privacy.html), [Firefox](http://support.mozilla.com/en-US/kb/Cookies#w_cookie-settings), [Internet Explorer](http://windows.microsoft.com/en-US/windows-vista/Block-or-allow-cookies), [Edge](https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy) and [Safari](http://www.apple.com/safari/features.html#security).

CCCI does not use 3rd party cookies or non-HTTP Local Shared Objects (LSO) cookies such as Flash or Silverlight.

**Confidentiality and security**

CCCI will store your data safely and, therefore, takes all precautionary measures to protect them against loss, abuse or changes. To try to prevent unauthorized access, maintain data accuracy and ensure the correct use of information, CCCI has implemented appropriate physical, electronic and managerial procedures to safeguard and secure the information collected on this site. You can obtain more information concerning the confidentiality and security measures in place by contacting clearance@copyclear.ie

CCCI’s employees or any of CCCI’s contractual partners who have access to your data in order to provide services to CCCI (e.g. its online domain/website hosting supplier, its database software supplier) are contractually obliged to keep such information in confidence and may not use these data for any other purpose than performing their contractual missions for CCCI.

**Your rights and ways to contact CCCI**

Conforming to the GDPR and the Irish data protection legislation, you have the right to withdraw your consent to the processing of your personal data at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

To the extent required by applicable law, you have the right to: i) have access to your personal data; ii) the right to have inaccurate data corrected or removed, iii) the right to object to the processing of your personal data; (iv) the right to restrict CCCI’s use of your personal data; (v) the right to receive your personal data in a usable electronic format and transmit it to a third party (right to “data portability”); and (vi) the right to lodge a complaint with your local data protection authority.

In particular, CCCI is committed to working with you to obtain a fair resolution of any complaint or concerns about privacy.  If, however, you believe that CCCI has not been able to assist with your complaint or concern, you have the right to make a complaint with the competent authority of the EU Member State where you reside or work or where you believe that your rights have been infringed.

In these cases, or if you have any other questions or wishes in connection with your personal data, please contact CCCI by sending a letter/fax/e-mail or calling at:

Central Copy Clearance Ireland

12 Clanwilliam Square

Grand Canal Dock

Dublin 2

Tel: +353 1 676 4876

Fax: +353 1 611 4834

Email: clearance@copyclear.ie