

## **Introduction**

County Carlow has established a strong identity and brand for its Garden Trail, which currently features a collection of 19 garden attractions and includes a mix of great old gardens, town-sized gardens more relevant to urban dwellers, community gardens, woodlands and award-winning garden centres.

Carlow's Garden Festival is an annual event held at the end of July and beginning of August each year delivered through interactive, themed workshops and guided tours in gardens and garden centres on the Carlow Garden Trail. Demonstrations and talks are delivered by some key names in UK and Irish gardening and environmental circles. Established since 2002 and held during the same period each year, the festival is now an annual event on the calendar of gardening enthusiasts, ensuring repeat visitors year-on-year, and is widely regarded as Ireland's most successful garden festival.

The garden festival is designed to enhance and complement the existing profile of the county's well-established gardening experience, not only during the festival itself, but also throughout the rest of the year by encouraging repeat visits. The festival also seeks to improve the local tourism experience by providing an attractive and sustainable festival, thus optimising the range of activities and "things to do" for visitors to the area.

In order to meet the needs of visitors to the Carlow Garden Trail and Festival, the Carlow Garden Trail Committee is required to collect, process and use certain types of information. The information sought may include "personal data" as defined by the Data Protection Acts and by the General Data Protection Regulation (GDPR). In addition, the Carlow Garden Trail Committee may be required, from time to time, to collect, process and use certain types of personal data to comply with regulatory and legislative requirements.

The Carlow Garden Trail Committee is committed to protecting the rights and privacy of all individuals in accordance with the EU General Data Protection Regulation, under the General Data Protection Regulation (GDPR). This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us, and applies to all of your data irrespective of the medium or method by which we obtained/received your personal data. This policy of the Carlow Garden Trail Committee should be read in conjunction with the Data Protection Act and Regulation EU No. 2016/679 the General Data Protection Regulations.

## **Definitions**

### **Article 4 (1) defines 'Personal Data'**

In this policy, the term 'personal data' means data relating 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, our possession, and includes data as described in data protection legislation.

### **Article 4 (2)' defines 'Processing' as**

"any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction"

### **What and who is a Data Controller?**

A Data Controller under Article 4 (7) of the General Data Protection Regulation (EU) No. 2016/679 means “the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law”

In this case the Carlow Garden Trail Committee is the Data Controller.

**Policy in Respect of Compliance with the Data Protection Acts:**

It is the policy of the Carlow Garden Trail Committee to comply fully with the Data Protection Acts. It will, as a Data Control Authority, carry out all duties and functions as set out in the Acts and ensure that the gathering and holding of data is done so solely within the terms of the Acts.

**Appointment and Role of a Data Protection Officer Under Article 37 (1)**

In accordance with the GDPR, the Carlow Garden Trail Committee is not required to appoint a Data Protection Officer, as the processing of personal data is not being carried out by a public authority or body. Additionally, the core activity of the Carlow Garden Trail Committee does not consist of processing operations, which require regular and systematic monitoring of data subjects on a large scale.

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## **Why do we have a privacy policy and statement?**

The Carlow Garden Trail Committee has created this Privacy Policy (the 'policy') in order to demonstrate the firm commitment of the organisation to privacy, and to assure you that in all your dealings with the Carlow Garden Trail Committee, we will ensure the security of the data you provide to us in the context of the General Data Protection Regulation and Data Protection Acts 1988 - 2018. This policy outlines the information we collect about you, how and why we use the information and the choices you have to restrict our usage of this information

The Carlow Garden Trail Committee's commitment is that all personal data processed in the course of its work will be dealt with in compliance with the principles relating to Processing Personal Data laid down in Article 5 (1) of the General Data Protection Regulation set out hereunder:

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- Lawfulness, Fairness and Transparency - Obtained lawfully, fairly and in a transparent manner
- Purpose limitation - Obtained for only specified, explicit and legitimate purposes
- Data Minimisation - Adequate, relevant and limited to what is necessary for purpose for which it was obtained
- Accuracy - Recorded, stored accurately and securely and where necessary kept up to date. Every reasonable step is taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay.
- Storage limitation – data is only retained for so long as is necessary for the purpose for which it is collected
- Accountability, integrity and confidentiality - Kept in a form which permits identification of the data subject for no longer than is necessary for the purposes for which the personal data are processed.
- Processed only in a manner that ensures the appropriate security of the personal data including protection against unauthorised or unlawful processing

Rights for individuals under the GDPR:

1. Subject access
2. To have inaccuracies corrected
3. To have information erased
4. To object to direct marketing
5. To restrict the processing of information, including automated decision making
6. Data portability

This policy sets out how the Carlow Garden Trail Committee will handle and process data, deal with a data request by a data subject and manage a breach of data.

### **1. What information do we collect?**

**The Carlow Garden Trail Committee may collect various types of personal information, which can vary depending on the nature of the activity, including:**

- A. **Tourism queries in respect of the Carlow Garden Trail or Carlow Garden Festival to the offices of Carlow Tourist Information Office:** Carlow Tourist Information Office staff provide a point of contact to the public in relation to queries received by e-mail/telephone/face-to-face/website and social media in respect of the Carlow Garden Trail and Festival. Processing is necessary for the performance of a task carried out in the public interest and is required for communication purposes. The public will be asked for contact details in order to communicate with them. They do not have to provide all contact details but providing more, such as name, address, e-mail address and phone number, makes it easier to communicate. To undertake this activity the staff of Carlow Tourist Information Office will collect their name, address, e-mail address and phone number or some of the foregoing dependent on the nature of the enquiry.

It may be necessary to share contact information in order to successfully deal with the query. Otherwise it is not intended to share this personal data. However, if the query is made via the suite of websites operated by Carlow Tourist Office, the company's website provider, Big Top Multimedia may be able to access same. A low risk data processing agreement is in place with this company. It may also be necessary to share information amongst staff members in order to deal with the enquiry fully. Personal data is retained until the query has been dealt with and then appropriately disposed of via a shredding machine.

- B. **Direct marketing:** contact information is collected at two sources: competitions at

promotional shows and events i.e. Bloom in the Phoenix Park and via the website sign-up form on [www.carlowgardentrail.com](http://www.carlowgardentrail.com). It is used to send e-zines containing information related to the Carlow Garden Trail and Festivals. Information usually consists of information relating to the Carlow Garden Trail, the Carlow Garden Festival, other gardening related events taking place throughout the year and special accommodation offers.

**B1. Direct marketing via website sign-up form:** The public will be asked for contact details in order to communicate with them. To undertake this activity the Carlow Garden Trail Committee will need their first name, surname and email address to determine their preferences. Sign up includes a double opt-in clause, in terms of GDPR.

**B2. Direct marketing via tourism competitions:** competitions are carried out at promotional shows including for example Bloom in the Phoenix Park or the RHSI Show in Russborough House. The competition entrant must give their name and contact details and winners are chosen randomly. The individual is given the choice to opt-in to receive Carlow Garden Trail Committee e-zines. Processing is only ever carried out on the basis of receiving consent. If they choose to opt in and they have given their email address details, they are added to the direct marketing database. If they decide against this option or have not provided an e-mail address their entry sheet is securely shredded once the competition is over. To undertake this activity the Carlow Garden Trail Committee needs their first name, surname and e-mail address. If an e-mail address is unavailable entrants may opt to give details of their physical address and/or phone number.

- C. **Website:** The Carlow Garden Trail Committee fully respects the rights and privacy of website browsers in relation to their interactions with the Carlow Garden Trail website

and endeavour to be transparent in our dealings with browsers as to what information is collected and how this information will be managed. The Carlow Garden Trail Committee only collects and uses individual user details where we have legitimate business reasons, and where we are legally entitled to do so.

When you create an account on the Carlow Garden Trail website, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and the Carlow Garden Trail Committee. In order for the Carlow Garden Trail to carry out their obligations under that contract we must process the information you give to the Carlow Garden Trail Committee. Some of this information may be personal information. The Carlow Garden Trail Committee may use it in order to:

- Sell tickets or products to you
- Provide you with our services
- Provide you with suggestions and advice on products, services and how to obtain the most from using the website
- Process this information on the basis that a contract exists between the Carlow Garden Trail Committee and you, or that you have requested the Carlow Garden Trail Committee to use before we enter into a legal contract
- Never send your bank or credit card details to the Carlow Garden Trail Committee by e-mail or other than by the form on the site which requests payment details. E-mail is not encrypted and is not considered a secure means of transmitting credit card numbers. The Carlow Garden Trail Committee never, ever asks for sensitive information via e-mail.
- When ordering products or services on the Carlow Garden Trail website, you will be asked to provide a credit card number. Depending upon the activity, some of the information is identified as mandatory and some as voluntary. If you do not provide the mandatory data with respect to a particular activity, you will not be able to engage in that activity.

D. **Mobile devices and Social Media:** Applications developed in connection with the website for mobile devices will operate and capture information as set out above. Applications developed by Carlow Garden Trail Committee but deployed on other platforms such as social media channels may provide feedback to us on activity and usage specific to a user.

## 2. How does Carlow Garden Trail Committee collect information from users?

### **Direct marketing via website sign-up form**

If users wish to utilise certain services located on specific sections of [www.carlowgardentrail.com](http://www.carlowgardentrail.com), they are requested to sign up. Services that currently require some form of sign up include:

- E-mail newsletters from the website - [www.carlowgardentrail.com](http://www.carlowgardentrail.com)

- Registering with the website for services including tickets for festivals and events for example

To register as a user of such services Carlow Garden Trail Committee needs to collect information such as, at a minimum, forename, surname and an e-mail address. Further questions may in some cases be asked to gain a clearer understanding of what the user is interested in, in order to personalise the information being given.

The website sign-up form is designed as a double opt-in to ensure full transparency (member of the public opts in to receive the e-zine of the Carlow Garden Trail Committee and then subsequently receives an e-mail to their e-mail address to re-confirm this decision). **Members of the public can unsubscribe from the direct marketing list at any time and additionally each e-zine distributed clearly features an unsubscribe option at the end of each e-mail.** Personal information can also be updated. Questions asked may vary dependent on the service being delivered. The Carlow Garden Trail Committee may also ask users to complete surveys that are used for research purposes, although there is no obligation to respond to them.

E-mail newsletter services are provided through MailChimp.com. The EU's Standard Contractual Clauses ("SCCs") are directly incorporated into the Data Processing Addendum (DPA) of Mail Chimp which automatically forms part of their Standard Terms of Use and applies to customer data protected by EU laws. An SCC has been completed by Mailchimp.

### **Website, mobile device and social media**

Most browser and landing pages collect certain information automatically, for example, type and version of operating system, screen resolution, device manufacturer and model, language, internet browser type and version, and the name. The Carlow Garden Trail Committee uses this information, for example, to make sure that the services provided by the Carlow Garden Trail Committee are functioning properly, to analyse the performance of services, and to make any necessary adjustments with a view to improving services.

- **IP Addresses:** IP addresses are automatically transmitted as part of any internet communication and collecting IP addresses is a common practice. The Carlow Garden Trail Committee collects IP addresses from visitors to the Carlow Garden Trail website (an IP address is a number that can uniquely identify a specific computer or other network device on the internet). This allows the Carlow Garden Trail Committee to identify the location of users, to block disruptive use and to establish the number of visits from different countries. This data is analysed for trend and statistical reasons, such as which parts of the website users are visiting and how long they spend there.
- **Cookies:** A cookie is a block of data that a web server places on a user's PC. Typically, it is used to ease navigation through the site. However, it is also a useful means for the website to identify the user, track the user's path through the site, and identify repeat visits to the site by the same user (or same user's machine). The Carlow Garden Trail Committee collates information on the company's website traffic that is represented in an aggregate format through cookies – cookie bot is the system in operation. Carlow

Garden Trail Committee uses third parties such as Google Analytics to collect user information, including through the use of cookies (flash and non-flash).

We will seek your consent to use cookies the first time you visit this website (or on subsequent occasions if the cookie that records such acceptance is deleted. If you do not wish to accept cookies or wish to disable cookies from the website of the Carlow Garden Trail you can use your browser to do so. Each browser is different to check the “help” menu of your browser to learn how to change your cookie settings. We do not exchange cookies with any third-party websites or external data supplies.

If you wish to learn more about cookies, more information is available on this website [www.aboutcookies.org](http://www.aboutcookies.org)

- **Web beacons:** The beacon is usually a small transparent graphic, one pixel in size, which may be located on a web page or in an e-mail. The transparent pixel is normally set to load an image from a different location on the web and may pass user information to the web server, such as the IP address, the duration of the visit and browser type. Cookies and web beacons assist the Carlow Garden Trail Committee in improving the website and to deliver many of the functions that make the browser experience more user friendly. A list of cookies used and the purposes for which they are used are outlined in the tables below.

First party cookies		
Cookie	Purpose	Expires
catAccCookies	Used to determine if the user has accepted these websites' Privacy Policy.	30 days
edu_mmi_session	Used by the carlowtourism.com website to determine login status	1 hour

Cookies which are found in other companies’ internet tools are also used to enhance the company’s website. ‘Social buttons’ are also used on the website, which enable browsers to share or bookmark the web pages.

Cookie Name	Expiration Time	Description	Provider
_ga	2 years	Used to distinguish users.	Google
_gid	24 hours	Used to distinguish users.	Google
_gat	1 minute	Used to throttle request rate.	Google

By using the website, browsers are agreeing to the use of cookies as described. The help menu on the menu bar informs how to prevent the browser from accepting new cookies, how to have the browser notify the user when they receive a new cookie and how to disable cookies altogether. Users can also disable or delete similar data used by browser add-ons, such as flash cookies, by changing the add-on settings or visiting the website of its manufacturer. For more

information about cookies and managing them, including how to turn them off, users are advised to visit [www.cookiecentral.com](http://www.cookiecentral.com). However, because cookies allow the user to take advantage of some of Carlow Garden Trail Committee's essential website features, it is recommended that they remain turned on.

Note: If an individual is aged 18 or under, a parent/guardian's permission must be sought before any personal information is provided to Carlow Garden Trail Committee. Users without this consent are not allowed to provide the company with personal information.

### **Mobile devices and social media**

Applications developed in connection with the website for mobile devices will operate and capture information as set out above. Applications developed by the Carlow Garden Trail Committee but deployed on other platforms such as social media channels may provide feedback to the company on activity and usage specific to a user.

Note: If a user is aged 18 or under, parental/guardian permission is required before any personal information is provided to the Carlow Garden Trail Committee. Users without this consent are not allowed to provide any personal information to the Carlow Garden Trail Committee.

Mobile applications developed in connection with the website for mobile devices operate and capture information as set out for browsers and devices and are also subject to this policy. Applications developed by the Carlow Garden Trail Committee but deployed on other platforms such as social media channels may provide feedback to the Carlow Garden Trail Committee on activity and usage specific to a user.

### **Images and Visual Content:**

The Carlow Garden Trail Committee, on occasion, takes photographs of participants at its events and festivals and endeavours to check that they are happy to feature in a photo wherever possible. However often photos are of a large group and it is not possible to check with each individual person in advance. Part of the terms of acceptance to attend festivals and events organised by the company is acceptance to be included in photographs, and by doing so giving the Carlow Garden Trail Committee permission to use these photos for legitimate business purposes such as evidencing the event took place, local, national or internal publicity or promoting similar events.

Where close up photographs are being taken which include individuals, a model release form and model release form for minors is presented and signed by the individuals and retained on file by the Carlow Garden Trail Committee (see Appendix 1).



### **3. How do we use the information we collect?**

The Carlow Garden Trail Committee collects different types of information about users for the following purposes:

- To personalise the way content is presented to users and to ensure that content from the Carlow Garden Trail website and other sources is presented in the most effective manner for usage on computers or mobile devices ([www.carlowgardentrail.com](http://www.carlowgardentrail.com))
- To assist in monitoring and improving the services offered, including those offered by [www.carlowgardentrail.com](http://www.carlowgardentrail.com). As part of this process, information may be used and disclosed in aggregate format (so that no individuals are identified)
- To carry out any legal obligations arising from a user's interaction with the website
- To provide users with information about the company's services, activities or online content. Users will only receive e-zines, newsletters, updates or similar correspondence from the Carlow Garden Trail Committee if they have "opted-in" to receive such information i.e. on the Carlow Garden Trail website via "Join Our Mailing List", on the Carlow Garden Trail face book page or via a physical form. Where such choices exist it will be made clear to you.
- To contact winning entrants in tourism competitions i.e. RHSI Show, Russborough House, Bloom in the Phoenix Park
- To communicate with users in respect of their queries regarding the Carlow Garden Trail, Carlow Garden Festival, other festival events held throughout the year and any general gardening queries
- To communicate with event and festival attendees
- To complete and fulfil a purchase i.e. to process a payment, complete an order or to communicate specific information in relation to the Carlow Garden Festival and festival events
- To facilitate the processing of ticket sales. Please note that payment information is never taken by us or transferred to us either through the website of the Carlow Garden Trail or otherwise. At the point of payment, you are transferred to a secure page on the website of (i.e. Stripe, Payeo/Pay Pal) or some other reputable payment service provider. The page may be branded to look like a page on the Carlow Garden Trail website, but it is not controlled by the Carlow Garden Festival.

Where the Carlow Garden Trail Committee wishes to use personal information in any other way, the Carlow Garden Trail Committee will ensure to notify users first. Users will also be given the opportunity to withhold or withdraw consent for the use of personal information for purposes other than those listed in this document.

### **4. Meeting legal and regulatory obligations**

The Carlow Garden Trail Committee's main role is to support the members of the Carlow Garden Trail operating in the county and to work to promote County Carlow for the quality and profile of its garden trail comprising 19 members drawn from public and private gardens, garden centres, nurseries and woodland.

- Processing personal data is recognised as being necessary in the context of the committee's objectives and is required for the performance of a task carried out in the interests of the economic, social and cultural life of those interested in the Carlow Garden Trail and garden related festivals.
- Processing data is necessary for the performance of a contract which has been entered into i.e. purchase of tickets
- Processing is necessary for compliance with legal obligations which the Carlow Garden Trail Committee must adhere to, under the GDPR Regulations
- In the context of consent provided for the processing of information under [Article 6(1) (a) of the General Data Protection Regulations, 2016].
- It is the policy of the Carlow Garden Trail Committee to adhere to all guidelines issued by the Office of the Data Protection Commissioner.
- It is the policy of Carlow Garden Trail Committee to detect, report and investigate a personal data breach in accordance with the Data Protection Act (DPA) and guidelines are issued by the Office of the Data Protection Commissioner in this regard. A data protection breach occurs where personal data or sensitive personal data is released without authority or consent. Such breaches may occur in the event of the loss of USB keys, disks, laptops, digital cameras and mobile phones, or other such electronic devices on which data is held as well as paper records containing data. A breach may also occur due to inappropriate access to such data on the Carlow Garden Trail Committee systems or the sending of data to the wrong individuals. In the event of a data protection breach, the breach is analysed and measures put in place to prevent a repetition of the incident.

The legal basis and legitimate interest for processing personal data are included in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 Development Strategies and Data Protection Act 1988 to 2018.

## **5. Linked services, third-party sites and content**

In some of the committee's marketing collateral which includes brochures, articles, videos, posts and blogs, the Carlow Garden Trail Committee may reference other websites and provide links which are outside of their control. This Privacy Statement applies only to personal data that the Carlow Garden Trail Committee collects/processes through use of the following website:

[www.carlowgardentrail.com](http://www.carlowgardentrail.com)

It does not apply to any links to third-party websites and/or services, such as third-party applications, that users may encounter when using the website or services of the Carlow Garden Trail Committee. The Carlow Garden Trail Committee does not accept any responsibility or liability for other sites' privacy notices, statements or policies. If users access other websites using the links provided, they are encouraged to familiarise themselves with the terms of usage and privacy policies applicable to any websites and/or services operated by third parties. Users are advised to carefully read specific notices before submitting any of their personal information.

## **6. Who is data shared with?**

Personal information may be shared or disclosed to:

- Authorised service providers and suppliers who provide services to the Carlow Garden Trail Committee such as website hosting, data analysis, payment processing, event organisation, information technology and related infrastructure provision, customer service, e-mail delivery, credit card processing and other similar services.

Any third parties who access your data in the course of providing services to the Carlow Garden Trail Committee are subject to contractual restrictions to ensure that data is protected, in compliance with data protection legislation. The Carlow Garden Trail Committee does not share or sell information with non-affiliated third parties for their own marketing or commercial use.

Carlow Garden Trail Committee reserves the right to access and disclose personal data to:

1. Comply with applicable laws and lawful government requests, to operate their systems properly and to protect both themselves and their users.
2. In order to enforce or apply our terms of use and other agreements
3. To protect the rights, property or safety of the Carlow Garden Trail Committee, our customers and others

## **7. How long is data retained?**

In order to meet legal and statutory obligations, any information provided to the Carlow Garden Trail Committee will be kept and stored for such period of time as is deemed necessary taking into account the purpose for which it was collected in the first instance, and the Carlow Garden Trail Committee's obligations under data protection legislation.

The Carlow Garden Trail Committee commits to reviewing data every three years from the last date of contact or transaction to ensure that data is only kept for as long as is necessary for the

purposes for which it was obtained. Additionally, the following time limits are in place for specific types of information collected:

TYPE OF PERSONAL DATA COLLECTED	TIME PERSONAL DATA IS RETAINED
A. <b>Tourism queries</b> to the offices of Carlow Tourist Information Office or Carlow Garden Trail Committee	Personal data is retained until the query has been dealt with and then appropriately disposed of via a shredding machine.
<b>B. Direct marketing</b> <b>B1.</b> Direct marketing via website sign-up form <b>B2.</b> Direct marketing via tourism competitions:.	B1: Processing is only carried out on the basis of receiving consent. Individual has the choice to opt-out at any time. B2: Processing is only carried out on the basis of receiving consent. Individual has the choice to opt-out at any time. If email address is not provided or decide against being added to the direct marketing database, their entry sheet is securely shredded once the competition is
C. <b>Website</b>	See Section 2 for details
D. <b>Mobile devices and Social Media:</b>	See Section 2 for details

## 8. Rights of data subjects?

Each data subject has the following rights under data protection legislation:

- the right to request access to personal data held by you
- the right to obtain confirmation as to whether data concerning you exists
- the right to be informed of the content and source of data and check its accuracy
- if the data held by the Carlow Garden Trail Committee is found to be inaccurate you have the right to change, remove, block, or object to the use, of personal data held by the Carlow Garden Trail Committee
- the right to ask the Carlow Garden Trail Committee to stop contacting you with direct marketing
- the right to restrict or prevent your personal data being processed
- the right to data portability
- the right to erasure
- the right to complain to the Data Protection Commissioner (DPC) if you believe the Carlow Garden Trail Committee has not handled personal data in accordance with the data legislation

The Carlow Garden Trail Committee endeavours to keep all personal data that you provide accurate and up to date. In this regard data subjects are asked to inform Carlow Garden Trail Committee about any changes to such information as soon as possible.

## **9. Policy in respect of Subject Access request (SAR)**

It is the policy of the Carlow Garden Trail Committee to have a central point of access for data protection requests as well as providing assistance to requesters.

If a data subject feels that their personal data has not been processed in accordance with this policy, please contact the Carlow Garden Trail Committee, free of charge, in writing as set out below. The Carlow Garden Trail Committee endeavours to respond without undue delay and no later than one month from receipt of any such request. If the Carlow Garden Trail Committee is unable to deal with your request within a calendar month (due to complexity or number of requests) this period may be extended by a further two calendar months and the reason for the extension request provided.

Please note that the Carlow Garden Trail Committee will request proof of identity and address (e.g a copy of a driving licence or passport) to protect the security of your data. The Carlow Garden Trail Committee should be contacted in the first instance at the following:

**Or writing to:**

Data Controller  
Carlow Garden Trail Committee  
c/o Mrs Mary Meaney  
Ballynolan  
Leighlinbridge  
Co Carlow

If not satisfied, the data subject can complain to the Data Protection Commissioner or exercise any of other rights pursuant to data protection legislation. Information about how to do this is available on the DPC website at <https://www.dataprotection.ie/>

## **10. Updates to this privacy policy**

This Privacy Policy may be updated from time to time, and at least annually so please check each time personal information is submitted. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use the website or other channels to submit personal information. If material changes are made to the Privacy Policy, users will be notified by placing a prominent notice on the company website.

**Appendix 1 – Photo Release Form**

**CARLOW GARDEN TRAIL COMMITTEE PHOTO RELEASE FORM**

I hereby give my consent that the photographs taken of me may be reproduced in advertising, publications, promotional email campaigns, websites and other materials or media for Carlow Garden Trail Committee and their associated partners.

In giving this consent, I release the photographer and the Carlow Garden Trail Committee and their associated partners from their responsibility for any violation of personal or proprietary rights I may have in connection with this use.

**Name:** \_\_\_\_\_

**Address:** \_\_\_\_\_

**Contact No:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Please tick box if participant is a minor,  
signature of parent/guardian is necessary**

## Appendix 2 - Personal data Request Form

### Personal Data Request Form

#### What you need to know before you fill in this form

In keeping with the GDPR, and the Data Protection Acts, 1988 to 2018 if you wish to:

- (a) Get a copy or to find out what personal data the Carlow Garden Trail Committee CLG holds on you and why (known as a Subject Access Request);
- (b) Rectify or update your information (e.g., surname, address, mobile number, etc.); or
- (c) Erase your personal information (known as the Right to Be Forgotten)

You have three options in terms of sending in this request to the Carlow Garden Trail Committee, they are as follows:

1. Please **complete this form** and submit it, with proof of identity that you are the *\*Data Subject*.
2. **E-mail:** [info@carlowgardentrail.com](mailto:info@carlowgardentrail.com). Your verification documentation can be sent in PDF format. If this is sent via the e-mail above, it can be password protected to ensure that if it is accidentally e-mailed to the wrong recipient, it cannot be opened. The password must be sent via a different communication method (i.e., by text message or verbally over the telephone to +353 (059) 913 0411
3. **Post** it to the Data Protection Administrator, Carlow Garden Trail Committee, c/o Mrs Mary Meaney, Ballynolan, Leighlinbridge, Co Carlow

If you are making the request on behalf of a Data Subject, an authorising letter signed by the Data Subject with proof of the Data Subject's identity must be submitted.

*\*Data Subject is the person who has a right to request **a, b or c** (as outlined above) and is the person who is the subject of the personal data in question.*

To process your request, the Carlow Garden Trail Committee may need you to request additional information or to seek clarification. The Carlow Garden Trail Committee will confirm the outcome of your request within 30 days of receiving your request.

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#### Your Contact Details

The contact details might be required to contact you to discuss your request.

First Name\*

Last Name\*

Email\*

Phone\*

Postal Address\*

**Note:** We require proof of the applicant's identity and address to ensure that the person making this access request is acting legitimately. The identification documents will only be kept for verification purposes and will be destroyed once this request case is closed.

1. **Certified original copy of valid photo ID (passport, new drivers' licence (card))\***

2. **A certified proof of address (i.e., the very top of a bank statement/utility bill that contains only your postal address and the date. The date of this should be within the last three months).\***

**Which of the following are you requesting?**

- Get a copy or to find out what personal data Carlow Garden Trail Committee holds on you and why
- Rectify or update your information (e.g., surname, address, mobile number, etc.,)
- Erase your personal information (known as the Right to Be Forgotten)

**Name of service(s) and any account / reference number relevant to your access request**



**Date From**

**Date To**

- Emails
- Documents
- Photographs
- Video
- CCTV Stills/Images
- Job Application/Interview Score Sheets
- Others, please explain below:

**Please note**

- 1) Where the request is regarded as manifestly unfounded or excessive, a reasonable charge will be made taking into account the administration costs of providing the information
- 2) By making a request via this email form or online you will receive the information back via email
- 3) By making a request via post you will receive the information via post

**Requesting to erase your personal data**

Upon request, we will remove your information if one of the following applies:

- Your personal information is no longer required for the purpose it was originally collected/processed
- The processing of your data was based on your consent, which you withdraw and there is no other legal reason for processing your personal information
- You exercise your right to object and there are no overriding lawful grounds for the processing
- Your personal information has been processed unlawfully.
- Your personal information needs to be erased to comply with a legal obligation

**Please note:**

- When you ask the Carlow Garden Trail Committee to forget your personal information, we will remove your information that we do not need to hold
- The Carlow Garden Trail Committee will no longer be able to process requests from you about the information after we have removed it

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I hereby declare and confirm that all information and supporting documents provided by me in connection with this Request are true, accurate and complete. I understand that it will be necessary for the Carlow Garden Trail Committee to verify my identity and that the Carlow Garden Trail Committee may contact me for more detailed information to process my request. I consent to the collection, use and disclosure of the personal data that I have provided in this form for the purpose of this request.

Declaration of Requester\*

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### What happens next?

Once you complete and send us this form, we will assess your request. We will notify you, in writing, of the outcome of your request. We will only use the information you give us on this form to examine and process your request.