

GS1 Ireland Data Privacy Statement

Last updated 25th May 2018

The EU General Data Protection Regulation (GDPR), which is in force as of May 25th 2018 provides new rights to individuals and requires organisations to provide information about their processing in a clear and transparent way.

We have published this updated Privacy Statement to take into account new requirements and to explain how we collect, store and use personal data. When we refer to “we”, “us” or “our” in this Statement we mean GS1 (Global Standards 1 (Ireland)) Limited.

This Privacy Statement applies to personal data collected by us and processed at our registered offices: Second Floor, Merrion Centre, Nutley Lane, Donnybrook, Dublin D04 KF62, Ireland, and under contract at the sites of service providers appointed by us.

GS1, as a Data Controller, is committed to protecting the privacy of the data subjects on who we hold data. The data subject(s) are approved contacts within member and partner organisations of GS1 as well as contacts in non-member companies who attend our events, subscribe to our updates or who purchase our services and interact with us having provided consent via our opt-in procedures. We endeavour to comply with the Data Protection Acts 1988 to 2018 (the “Acts”) and other relevant legislation.

Please read the following statement to learn more about how we collect, store, use and disclose information about you when you:

- join GS1 as a member, purchase a licence or subscribe to a service;
- participate in a committee or working group;
- attend an event (physical or virtual);
- use our website and social media sites or interact with us via marketing in any manner.

How to contact us

If you have any questions about this Privacy Statement or would like to contact us about any other matter, please use the following contact information:

Email: DataPrivacy@gs1ie.org

Address: Data Privacy Officer, GS1 Ireland, Second Floor, Merrion Centre, Nutley Lane, Donnybrook, Dublin D04 KF62, Ireland

1. How we collect your personal data

We collect personal data in the following ways:

- When you provide your contact details to us when registering your company for membership of GS1, subscribe for a licence or join one of our partner programmes;
- When you request information about our products or services, either via the telephone, through an online enquiry form or in-person;
- When you register to attend one of our events or webinars;
- When you register for training (classroom or online);
- When you sign up for our email newsletters;
- When you avail of our advisory and consultancy services.

2. The types of personal data we process

The personal data we routinely collect from you and process may include:

- Full name
- Business email address
- Business address
- Job title
- Company name
- Company phone number
- Mobile phone number (which may be a work number or a personal number)
- Username (which may be your email address - to enable you to login to our website)
- Other contact details such as social media profiles for your business (e.g. Twitter handle, Business Facebook Page, LinkedIn Page, Pinterest or Instagram pages)

We realise that some of the business-related details (e.g. Address) may also be personal. We do not collect any special categories of personal data such as sensitive data, as defined under the GDPR.

Children

Our products and services are not aimed at children. We do not knowingly collect or solicit personal information from anyone under the age of 16. If you are under 16, please do not attempt to register for any services or send any personal information to us. If we learn that we have collected personal information from a child under age 16, we will delete that information as quickly as possible. If you believe that a child under 16 may have provided us Personal Information, please contact us.

3. How we use your personal data

We may use your personal data for the following purposes:

Type of Personal Data	Purpose of Data	Legal Basis for Processing
<p>Member Contact Details - we store the contact details of individuals in member organisations including the original purchasers of licenses and services and the current contacts, for license management, invoicing and standards update purposes.</p>	<p>To enable us to provide products and services to your organisation; To enable us to contact you with information pertinent to your membership; To maintain records of which individuals purchase products on behalf of companies; To allow us to invoice your company for products and services.</p>	<p>For the performance of a contract or agreement</p>
<p>Contact details from non-members which were provided for the purpose of attending one of our events or webinars or receiving sector updates, newsletters or information guides</p>	<p>To facilitate your attendance at one of our events or webinars; To enable your receipt of email and/or postal notifications about standards updates and future events.</p>	<p>Consent</p>
<p>Partner organisation contact details</p>	<p>To maintain records of current and past partner organisations and subscribers to the GS1 Solution Provider Programme. A list of our partners is available on our website.</p>	<p>Contract and Our Legitimate Interests, which we have balanced with the interests of our partners.</p>

Board Members	To make the names and company names of current <u>board members</u> available to the wider membership.	Consent
Website Visitors (IP addresses only, unless the visitor has logged-in)	To administer the website. To track your use of our websites and interaction with our applications, for example, to understand which content is most popular with our visitors, to see where users may be experiencing problems with some of our processes. (Please also see our Cookie Policy for more details).	Contract and Our Legitimate Interests, which we have balanced with the interests of our members, partners and members of the general public.
Barcode Manager Application Users - company name, email address/username and advertised IP address of the device you use to access the application.	To provide you with access to our Barcode Manager/Activate application. This application is provided free as part of your membership. Use of the application is not mandatory.	For the performance of a contract or agreement

We do not use personal data for automated decision making.

4. About our electronic communications

On the GS1 website we invite you to opt-in and give your consent to receive communications from us. You can unsubscribe from these emails at any point by clicking on the unsubscribe link on any newsletter email you receive from us. Alternatively, you can unsubscribe on our website at: www.gs1ie.org/unsubscribe.

5. Your rights regarding your personal data

You have a number of rights under data protection law, which have been strengthened under the General Data Protection Regulation (GDPR):

- **Access:** You have the right to know what personal data we may hold about you and the purposes for which we are using it. You need to make this request to us in writing providing details which would allow us to uniquely identify you (including some of the following: name, current and previous companies, addresses, phone numbers, company bank account number, job titles, email address). In order not to divulge details to the wrong person we may ask for proof of your identity. On receipt of such a request we will endeavour to respond to you as soon as possible, at most within one calendar month.
- **Rectification:** You have the right to request that we amend any personal data which is incorrect or requires updating. We will assess any such request and will endeavour to respond to you as soon as possible, at most within one calendar month.
- **Restriction:** You have the right to request that we restrict the use we make of your personal data. We will assess any such request on a case-by-case basis and will endeavour to respond to you as soon as possible, at most within one calendar month. Please bear in mind that some restrictions would mean we will not be able to provide any service which would mean removing you from our systems(s).
- **Objection:** You have the right to object to our processing of your personal data. We will assess any such request on a case-by-case basis and will endeavour to respond to you as soon as possible, at most within one calendar month. If the basis on which you provided the data was consent then we will erase the data. If however, your contact details are held as a general member company contact then we will require an alternate contact from your company before we can erase your data. Where you are the original purchaser of a product or License from us it may be necessary to retain your name (only) on file for the purpose of resolving any future disputes.
- **Erasure:** You have the right to request that we delete any personal information pertaining to you. We will assess any deletion request on

a case-by-case basis and will endeavour to respond to you as soon as possible, at most within one calendar month. The issues for member contacts outlined in the paragraph on “Objection” (above) will apply here also.

If you would like to exercise any of these rights or if you are concerned about the manner in which we have collected and used your personal data, please contact us and we will do our best to help.

6. Where we store your personal data

We store and process your personal data at our registered offices at GS1 Ireland, Second Floor, Merrion Centre, Nutley Lane, Donnybrook, Dublin D04 KF62, Ireland, and on servers maintained by our data processors. Neither we nor our service providers will transfer data outside the European Economic Area (EEA) if the importing country does not have an [EU approved level of data protection law](#).

7. How we keep your personal data secure

GS1 takes the protection of your personal data very seriously and we take appropriate technical, organisational and administrative security measures to protect any information we hold in our records from loss, misuse, unauthorized access, disclosure, alteration or destruction. Unfortunately, no company or service can guarantee complete security. Unauthorised entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

GS1 may use external data service providers to process personal data on our behalf. When we do so, we have appropriate agreements in place to protect the data. Any data transfers between external service providers and ourselves are conducted by secure means.

8. Sharing of your personal data

We may disclose your personal data, if required to do so by law, or if you authorise us to disclose it to your representatives or advisers. We may also disclose the information to our lawyers, accountants and auditors for the purpose of the service they provide to us. As data processors they are bound by the same terms and conditions as GS1 in regard to personal data.

We may share your information with third party vendors, consultants and other service providers who we employ to perform tasks on our behalf. These companies include (for example) our payment processing providers, database providers, website analytics companies (e.g. Google Analytics),

product feedback or software providers (e.g. LeadPages), email service providers (e.g. MailChimp) and partners with whom we organise co-hosted events. We ensure that we only work with companies that are GDPR compliant and endeavour to ensure the security of your information and that it is processed according to GDPR Provisions.

9. How long we store your personal data for

We will only retain personal data for as long as is necessary for the purposes we are using it for. How long we retain data will vary depending on the purposes it is used for. We routinely update our email newsletter lists to remove contacts who have opted out; changed role (information is no longer relevant) or left the member company. We contact Members once per year and invite them to update the contact details they hold on file with us. Members, Partners and Non Member Stakeholders may update their details at any time by contacting our Membership Services Team or by submitting a Member Update Form to us by post, email or fax.

A Contacts Details Update Form can be found on our website at:

<https://www.gs1ie.org/!JKFZXI>

Business Area	Type of Data	Retention Period	Comments
Website	Login Profiles	5 years after last login (for active members) or within 3 months of membership cancellation	GS1 CRM rules
Members	Contact Details for individuals in the organisation	Indefinitely until organisation ceases to be a member or the contact is changed.	GS1 CRM rules
Mailing Lists	Contact Records	Indefinitely until organisation ceases to be a member; or contact leaves company; or 5 years of no activity (e.g. opens or clicks)	Can be unsubscribed or deleted on request or withdrawal of consent.

10. External Links

Please note that if you use a link to go from our website to another website, or you request a service from a third party, this Privacy Statement will no

longer apply once you have left our website. Your browsing and interaction on any other website is subject to that website's own rules and policies.

11. Social Media

As a member organisation we actively promote and feature our partners, members and their products and services across our social media channels. We invite all members and partners to follow our social media platforms (including but not limited to the GS1 accounts on Twitter, Facebook, LinkedIn, Pinterest and Instagram) to share relevant news, updates, announcements and industry updates.

GS1 Ireland proactively seeks to follow and support (through likes, comments, shares etc) members and partners who use such social media and invite all industry stakeholders to follow the relevant GS1 Ireland pages in return, if they so wish. Members and Partners may follow / unfollow any GS1 Ireland social media account at their discretion. We may collect and store the name/url of your business-related social media accounts in order to facilitate posts, follows, likes and shares and to identify the topics of most interest and relevance to our audience.

A like, comment or share of a post, by GS1 Ireland, does not imply an endorsement or recommendation for any company, product or service. By their nature posts on social media platforms are public and confidential information will never be disclosed or shared.

From time to time GS1 Ireland may use social media platforms and search engines (e.g. Google, Bing) to run advertising campaigns and sponsored posts to promote our updates, courses, events, members and partners (with their permission).

We do not harvest personal data from social media sites and have no control over personal data which is sent to us via social media and would not encourage correspondents to provide such information on those sites. Please see the terms and conditions and privacy statements provided by the social media companies to see your rights on those sites.

12. Cookies

We use cookies to operate our websites, to understand how visitors use our websites and to track your interaction with our applications. Information on the cookies we use is contained in [our cookie policy](#) which is available on our website.

13. Updates to this Statement

We review and update this statement regularly to take account of changes to our processing and any regulatory changes. We encourage you to review it from time to time. If we make any significant changes to this statement, we will endeavour to communicate this to you where possible by placing a notice on our Website and/or by sending you an email (if you have registered your e-mail details with us) when we are required to do so by applicable law. You can see when this Privacy Policy was last updated by checking the date at the top of this page.

You are responsible for periodically reviewing this Privacy Policy. If you see any information here which is not clear, or if you have any questions or concerns regarding our privacy policies, please send a detailed query to the contact address above.

If you are not satisfied with our response please let us know and we will review it. You have the right to lodge a complaint with the Data Protection Commission. Please see www.dataprotection.ie for further information.

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