



Advanced User Guide

Website Privacy Policy

This guide is one of a series of "How To" Guides" produced by Enterprise Ireland to meet the needs of Irish companies, particularly our client base, the majority of whom are small to medium enterprises (SMEs) in manufacturing or internationally traded services.

They are designed for non-IT professionals charged with developing and/or implementing eBusiness/IT strategy in their companies. Hopefully they may also be of use to IT professionals.

These guides are only one of a range of eBusiness resources provided by Enterprise Ireland. Most of the other resources, can be accessed through our eBusiness webpages

**[www.openup.ie](http://www.openup.ie)**

Here you can access more guides and cases about eBusiness and related topics, details of solution providers, access to our free eBusiness e-zine and discussion forum, eBusiness events guide and links to interesting reports etc.

The funding for these guides was provided to Enterprise Ireland by "The Information Society Fund" which was established by Government to progress the objectives of the Government's Action Plan for the Information Society.

There are legal restrictions, which vary by country, on what you may and may not do with personal data. Customers may also have strong views on how you use their data. For these reasons, websites, which capture any type of data about the people who visit them, should have a clearly stated privacy policy. The website should have a clearly visible link to this policy. You should think carefully before writing a policy, because, once written it is important to obey it.

This is an advanced guide on how to develop suitable “Privacy Policy” for your website. The sample “Privacy Policy” in this document has been supplied by The Irish Internet Association (IIA), and was developed by the IIA Legal Working Group. This “Privacy Policy” is usually only available to members on the members area of the IIA website, along with other useful documents. If you would like to join the IIA click here [https://www.iaa.ie/member\\_join.asp?id=27](https://www.iaa.ie/member_join.asp?id=27).

You will need to get expert legal advice when drafting your “Privacy Policy”. This is the IIA’s sample “Privacy Policy” which outlines sample privacy policy terms.

You can see other privacy policies by clicking on the “privacy policy” link of websites you visit.

## IIA Legal Working Group

Draft Template Website Privacy Policy  
[Insert URL of Website]

### 1. Introduction

We at [INSERT NAME] respect your right to privacy and comply with our obligations under the Data Protection Acts 1988 and 2002. The purpose of this Website Privacy Policy is to outline how we deal with any personal data you provide to us while visiting this website. Naturally, if you are not happy with this Website Privacy Policy you should not use this website.

By visiting this website, you are accepting the terms of this Website Privacy Policy. Any external links to other websites are clearly identifiable as such, and we are not responsible for the content or the privacy policies of these other websites.

### 2. Types of Information Collected

We retain two types of information:

- “Personal Data”  
This is data that identifies you or can be used to identify or contact you and may include your [LIST TYPES OF PERSONAL DATA COLLECTED e.g. name, address, email address, user IP addresses in circumstances where they have not been deleted, clipped or anonymised, telephone number, birth date and billing and credit card information]. Such information is only collected from you if you voluntarily submit it to us.
- “Non-Personal Data”  
Like most websites, we gather statistical and other analytical information collected on an aggregate basis of all visitors to our website. This Non-Personal Data comprises information that cannot be used to identify or contact you, such as demographic information regarding, for example, user IP addresses where they have been clipped or anonymised, browser types and other anonymous statistical data involving the use of our website.

### 3. Purposes for which we hold your Information.

- **Non-Personal Data:**  
We use the Non-Personal Data gathered from visitors to our website in an aggregate form to get a better understanding of where our visitors come from and to help us better design and organise our website.
- **Cookies** *[REMOVE THIS PARAGRAPH IF NOT APPLICABLE TO YOUR WEBSITE]*  
This website uses "cookie" technology. A cookie is a little piece of text stored by the browser on your computer, at the request of our server. We may use cookies to deliver content specific to your interests and to save your personal preferences so you do not have to re-enter them each time you connect to our website - our cookies are not available to other websites. Our cookies will record the following *[INSERT DETAILS OF THE MAIN CHARACTERISTICS RECORDED BY THE COOKIE]*. You are always free to decline our cookies, if your browser permits, or to ask your browser to indicate when a cookie is being sent. You can also delete cookie files from your computer at your discretion. Note that if you decline our cookies or ask for notification each time a cookie is being sent, this may affect your ease of use of this website.
- **Personal Data**  
We will process any Personal Data you provide to us for the following purposes:
  - (a) to provide you with the goods or services you have ordered;
  - (b) to contact you if required in connection with your order or to respond to any communications you might send to us;
  - (c) *[OTHERS - LIST CLEARLY ALL PURPOSES FOR WHICH DATA WILL BE HELD AND PROCESSED]*

### 4. Disclosure of Information to Third Parties

We may provide Non-Personal Data to third parties, where such information is combined with similar information of other users of our website. For example, we might inform third parties regarding the number of unique users who visit our website, the demographic breakdown of our community users of our website, or the activities that visitors to our website engage in while on our website. The third parties to whom we may provide this information may include *[LIST THIRD PARTIES e.g. potential or actual advertisers, providers of advertising services (including website tracking services), commercial partners, sponsors, licensees, researchers and other similar parties]*.

We will not disclose your Personal Data to third parties unless you have consented to this disclosure or unless the third party is required to fulfil your order (in such circumstances, the third party is bound by similar data protection requirements). *[NOTE: THIS REQUIRES YOU TO HAVE A CONTRACT IN PLACE WITH THE THIRD PARTY OBLIGING THE THIRD PARTY TO COMPLY WITH THE DATA PROTECTION REQUIREMENTS]* We will disclose your Personal Data if we believe in good faith that we are required to disclose it in order to comply with any applicable law, a summons, a search warrant, a court or regulatory order, or other statutory requirement.

### 5. Sale of Business

We reserve the right to transfer information (including your Personal Data) to a third party in the event of a sale, merger, liquidation, receivership or transfer of all or substantially all of the assets of our company provided that the third party agrees to adhere to the terms of the Website Privacy Policy and provided that the third party only uses your Personal Data for the purposes that you provided it to us. You will be notified in the event of any such transfer and you will be afforded an opportunity to opt-out.

### 6. Security

Your Personal Data is held on secure servers hosted by *[our Internet Service Provider]*. The nature of the Internet is such that we cannot guarantee or warrant the security of any information you transmit to us via the Internet. No

data transmission over the Internet can be guaranteed to be 100% secure. However, we will take all reasonable steps (including appropriate technical and organisational measures) to protect your Personal Data.

### 7. Updating, Verifying and Deleting Personal Data

You may inform us of any changes in your Personal Data, and in accordance with our obligations under the Data Protection Acts 1988 and 2002 we will update or delete your Personal Data accordingly. To find out what Personal Data we hold on you or to have your Personal Data updated, amended or removed from our database, please complete this form *[CREATE FORM THAT DATA SUBJECT CAN COMPLETE FOR THIS PURPOSE AND INSERT LINK]* and email it to us at *[INSERT EMAIL ADDRESS]*. Any such data subject requests may be subject to the prescribed fee.

### 8. Changes to the Website Privacy Policy

Any changes to this Website Privacy Policy will be posted on this website so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If at any time we decide to use Personal Data in a manner significantly different from that stated in this Website Privacy Policy, or otherwise disclosed to you at the time it was collected, we will notify you by email, and you will have a choice as to whether or not we use your information in the new manner.

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## Irish Office Network

Office Telephone

Fax

Address

### Enterprise Ireland

Cork	+ (353 21) 800 200	+ (353 21) 800 201	Rossa Avenue, Bishopstown, Cork.
Donegal	+ (353 74) 69800	+ (353 74) 69801	Portland House, Port Road, Letterkenny, Co. Donegal.
Dublin	+ (353 1) 857 0000/808 2000	+ (353 1) 808 2020	Glasnevin, Dublin 9.
	+ (353 1) 857 0000/206 6000	+ (353 1) 206 6400	Merrion Hall, Strand Road, Sandymount, Dublin 4.
	+ (353 1) 857 0000/808 2000	+ (353 1) 808 2802	Wilton Park House, Wilton Place, Dublin 2.
	+ (353 1) 609 2150	+ (353 1) 609 2151	35-39 Shelbourne Road, Dublin 4.
Galway	+ (353 91) 735 900	+ (353 91) 735 901/2	Mervue Business Park, Galway.
Kerry	+ (353 64) 34133	(353 64) 34135	57 High Street, Killarney, Co. Kerry.
Louth	+ (353 42) 935 4400	+ (353 42) 935 4401	Finnabair Industrial Park, Dundalk, Co. Louth.
Sligo	+ (353 71) 59700	+ (353 71) 59701	Finisklin Industrial Estate, Sligo.
Waterford	+ (353 51) 333500	+ (353 51) 333501	Industrial Estate, Cork Road, Waterford.
Westmeath	+ (353 902) 87100	+ (353 902) 87101	Auburn, Dublin Road, Athlone, Co. Westmeath.

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



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