



**GREEN SOD  
IRELAND**  
PROTECTING WILD ACRES

**GREEN SOD LAND TRUST  
COMPANY LIMITED BY GUARANTEE**

**Working Title: Green Sod Ireland - *An Fóidín Glas***

# **Privacy Policy**

**In accordance with GDPR Directives**

## **1. Introduction**

- 1.1 We are committed to safeguarding the privacy of all supporters, friends, benefactors of Green Sod Land Trust operating as Green Sod Ireland.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of all Green Sod Ireland's website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information.
- 1.4 In this policy, "we", "us" and "our" refer to Green Sod Land Trust Company Limited by Guarantee. Reg Charity No: 20062262

## **2: How we use your personal data**

Article 13(1) of the GDPR provides that:

"(1) Where personal data relating to a data subject is collected from the data subject, the controller shall, at the time when personal data is obtained, provide the data subject with all of the following information: ... (c) the purposes of the processing for which the personal data is intended, as well as the legal basis for the processing; (d) where the processing is based on point (f) of Article 6(1), the legitimate interests pursued by the controller or by a third party".

Article 6(1)(f) of the GDPR provides that:

"(1) Processing shall be lawful only if and to the extent that at least one of the following applies: ... (f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child."

## **3. How Green Sod Ireland uses your data**

3.1 Article 14 of the GDPR, which applies where personal information is not obtained from the data subject, provides that information about "the categories of personal data concerned" must be supplied to data subjects.

Article 13 of the GDPR, which applies where personal information is obtained from the data subject, does not include an equivalent provision.

Policy: Privacy

Date: January 2012

Review Date: ~~2020~~; 2023.

Charity Reg. No. 20062262

- 3.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data Green Sod Ireland's analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
- 3.3 We may process your account data ("**account data**"). The account data may include your name and email address. The source of the account data is you. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.
- 3.4 We may process your information included in your personal profile on our website ("**profile data**"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is consent, our legitimate interests, namely the proper administration of our website and business.
- 3.5 We may process your personal data that is provided in the course of the use of our services ("**service data**"). The service data may include land data/folios. The source of the service data is you. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent or our legitimate interests, namely, the proper administration of our website and business, OR the performance of a contract between you and us, and/or taking steps, at your request, to enter into such a contract
- 3.6 We may process information that you post for publication on our website or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR
- 3.7 We may process information contained in any enquiry you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is consent.

- 3.8 We may process information relating to transactions, including gifts/purchases of goods and services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our website and business.
- 3.9 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent OR the performance of a contract between you and us.
- 3.10 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
- 3.11 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.12 We may process any of your personal data identified in this policy where necessary, for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.13 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 3.14 Please do not supply any other person's personal data to us, unless we prompt you to do so.

#### **4. Providing your personal data to others**

Policy: Privacy

Date: January 2012

Review Date: ~~2020~~; 2023.

Charity Reg. No. 20062262

- 4.1 We may disclose your personal data to any member of our group of companies, this means our subsidiaries, our ultimate holding company and all its subsidiaries insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
- 4.2 We may disclose your personal data to our insurers and/or professional advisers, insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## **5. Retaining and deleting personal data**

- 5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

## **6. Amendments**

- 6.1 We may update this policy from time to time by publishing a new version on our website.
- 6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

## **7. Your rights**

- 7.1 In this Section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 7.2 Your principal rights under data protection law are:
  - (a) the right to access;
  - (b) the right to rectification;
  - (c) the right to erasure;
  - (d) the right to restrict processing;

- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

## **8. Our details**

8.1 This website is owned and operated by *Green Sod Ireland*

8.2 We are registered in Ireland under *Charity Reg# 20062262* to the registered name of *Green Sod Land Trust Company Limited by Guarantee*; our working title is *Green Sod Ireland*. Our registered office is at 8 Bowling Green, Galway H91 Y9X8, Ireland.

8.3 Our principal place of business is virtual.

8.4 You can contact us:

- (a) by post, to 8 Bowling Green, Galway H91 Y9X8, Ireland
- (b) by website contact form: [www.greensodireland.ie](http://www.greensodireland.ie)
- (c) by phone: +353 85 853 7216
- (d) by email: [greensodireland@gmail.com](mailto:greensodireland@gmail.com)

## **9. Data protection officer**

9.1 Our data protection officer Jenny's contact details are: [greensodireland@gmail.com](mailto:greensodireland@gmail.com)

## **2. Credit**

2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com>).

Reviewed on 21.05.2018 as per new GDPR Directives

