



# THE DIGITAL HUB

## PRIVACY POLICY

Digital Hub Development Agency

May 2018

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### 1. Introduction

The purpose of this document is to provide a policy which outlines how the Digital Hub Development Agency (DHDA) processes personal data and the rights individuals have in relation to their own personal data.

This includes obligations in dealing with personal data to ensure compliance with General Data Protection Regulations (GDPR).

DHDA takes privacy and the protection of personal data very seriously and will continue to ensure that the protection of personal data processed by DHDA is treated with in line with our highest standards.

This policy outlines how we process your data, the legal bases relied upon, and your rights to this data.

We advise you to carefully read through this policy and contact us with any queries on the information contained below.

This policy is separate to the Digital Hub Development Agency's website Privacy Statement (available at <https://www.thedigitalhub.com/privacy-statement/>), which is DHDA's public declaration of how the organisation applies the data protection principles to data processed on its website.

## 2. Contacting us

If you wish to contact the Digital Hub Development Agency to make a data subject access request, or have any queries about the data we process please contact the Data Protection Officer at: [dataprotection@thedigitalhub.com](mailto:dataprotection@thedigitalhub.com) or call 01-4806200

## 3. Categories of data subjects

Personal data we process includes but may not be limited to client companies, prospective clients of DHDA, third party services providers, participants of strategic projects run by DHDA, staff and board members and other stakeholders.

## 4. Personal Data Collected by DHDA

Through the course of our work, we collect limited personal information from data subjects.

### Client Companies

From our clients, we collect names, email addresses and telephone contact numbers. This information is collected in the move-in process and establishment of our contracts.

We also sometimes video and photograph events through the course of our work.

### Suppliers and Contractors

From suppliers we collect names, email addresses and telephone contact numbers. This is gathered in the course of the contract provided.

### Course Participants

For course participants we collect names, email address, in certain cases home addresses and contact information from guardians. We also sometimes video and photograph events through the course of our work.

### Hub News Subscribers

Names and email addresses are gathered for Hub News. Subscribers submit this information when consenting to be part of our subscriber list.

## Other Stakeholders

For other stakeholders that we invite to specific events/courses in the course our work, we hold names and email addresses and other personal information such as staff PPS numbers etc.

## 5. How DHDA uses personal information?

Through the course of our operation we collect and process personal data for a number of purposes and in doing so we rely on different legal bases for processing of this data.

These purposes include:

- Establishing contracts and providing services based on these contracts with client companies
- Management of the campus through contracts with service providers
- Delivering marketing and events communication
- Communication on relevant community and enterprise events.
- Security of The Digital Hub campus

## 6. Legal Basis to process your data

DHDA relies on three different legal bases to process personal data. They are:

### 1) For the performance of a contract.

DHDA's core business is to enter into contracts with client companies to provide rented office accommodation.

### 2) For our legitimate business interests

Where we process your information for our legitimate interests, we ensure that there is a fair balance between our legitimate interest and your fundamental rights and freedoms.

We often record footage of our events held on campus for our legitimate business interests. We may use your contact information to invite you to events that we feel may interest.

### 3) Consent

We will, in certain circumstances, rely on your explicit consent to process your personal data. Examples of this include obtaining consent to record an interview with you to be used as part of our promotional marketing. This consent can be withdrawn at any time. Users can unsubscribe from Hub News on the links provided on the emails, and any other request to withdraw consent can be made by emailing [dataprotection@thedigitalhub.com](mailto:dataprotection@thedigitalhub.com)

## 7. When do we share personal data?

Personal data (names and email addresses) is shared with certain services providers in their management of The Digital Hub campus and related services including:

- Facilities management
- Internal Audit
- PR
- Learning Programme Project management
- Legal Services
- IT Network Support Services
- CRM

DHDA has ensured that Data Processor Agreements are in place with all services providers that we share personal data with to ensure they treat your data with the same level of protection.

## 8. How long do we keep your personal data for?

DHDA has set out specific retention periods for all personal data held. However, if you wish to make a request to stop processing your personal data at any stage you have the right to do so.

DHDA will securely dispose of data when it is no longer required.

## 9. Your rights in relation to personal data

The data subject has the following rights over their personal data –

- access to personal information
- correction and deletion
- withdrawal of consent (if processing data on condition of consent)
- data portability
- restriction of processing and objection
- lodging a complaint with the Data Protection Commission

## 10. Making a Data Subject Access Request

To make a Data Subject Access Request, the data subject must:

- Email [dataprotection@thedigitalhub.com](mailto:dataprotection@thedigitalhub.com) with 'Data Subject Access Request' in the subject line. Alternatively, write to: Data Protection Officer, Digital Hub Development Agency, The Digital Hub, Dublin 8, D08 TCV4.
- Please outline the specific data subject access request you are making.
- Attach a photocopy of your proof of identity and address to the email/letter.

Once we have received your Data Subject Access Request as described above, DHDA will respond to you within the statutory period of thirty (30) days.

There is no fee associated with Data Subject Access requests. However, if any further copies are requested by the data subject, DHDA may charge a reasonable fee.

DHDA will provide the requested information in electronic form, unless otherwise requested by the Data Subject.

If the Data Subject is not satisfied with the outcome of their Data Subject Access Request they are entitled to make a complaint to the Data Protection Commissioner who may investigate the matter on their behalf.

## 11. Use of automated decision-making and profiling

No automated decision-making and profiling is carried out relating to your personal data.

## 12. Use of cookies on our Website

Our policy regarding the collection of cookies through [www.thedigitalhub.com](http://www.thedigitalhub.com) website is available to read here: [Cookie Policy](#)

Other than the use of cookies, the DHDA does not collect any personal data about you on this website, apart from information which you volunteer.

## 13. Transfers outside the European Economic Area

We do not transfer any data outside the EEA.

## 14. Data security

DHDA has policies and procedures in place to protect your personal data from loss, misuse, alteration or unintentional destruction.

## 15. Changes & updates to this statement

We recommend you check this policy on a regular basis to ensure you remain in agreement with the activities we carry out in respect of processing personal data.