

## Privacy Statement (applicable to Members)

### General

The Irish Travel Agents Association Limited (the "ITAA"), having its registered office at Westmoreland Street, Dublin 2 is the data controller.

The business of the ITAA is that of a business representative organisation, which represents its members and also provides information on a range of lobbying and sector related issues and initiatives to officials (national, European and international), suppliers, commentators, the media and other stakeholders.

The ITAA is committed to protecting and respecting member's privacy. This notice sets out what we do with any personal (and non-personal) data we collect and the uses (including disclosures to third parties) we make of such data. Any personal information which you volunteer to the ITAA will be treated with the highest standards of security and confidentiality, strictly in accordance with the Data Protection Acts, 1988 – 2003 and the EU General Data Protection Regulation ("GDPR").

### Collection and use of personal information

#### Types of information collected by the ITAA

We collect and further process two types of information:

'Non-Personal Data'

Non-Personal Data comprises information that cannot be used to identify or contact you, such as IP addresses, where they have been clipped or anonymised, browser types and other anonymised statistical data involving the use of our website.

'Personal Data'

This is data that identifies you or can be used to identify or contact you and may include your name, address, user IP addresses and telephone number, which you have submitted voluntarily.

When applying for membership of the ITAA, member organisations are asked to nominate named contacts in their business/organisation with whom the ITAA may communicate to provide ITAA services. These contact details are collected on a business to business basis and the legal basis for such data collection is to facilitate the necessary performance of the membership contract.

We may also collect information which you volunteer (for example by e-mailing us, by using our online feedback form, by corresponding with us by phone or otherwise), such as your name and contact details, including your address, phone number and email address.

We may process other personal data if you are attending an ITAA event, or when we or third party public relations advisers, retained by us, are communicating with policy, media and other stakeholders with whom the ITAA communicates as part of its role as a representative organisation.

We also hold supplier contact details which will contain individual names.

### How do we use non-personal data and your personal data and the legal bases for processing this data

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### Non-Personal Data

We use non-personal data gathered from visitors to our website, [www.itaa.ie](http://www.itaa.ie) to generate and analyse statistics regarding usage of our website, for example we use Google analytics which show the traffic of visitors around our web site (for example pages accessed, time spent on site, whether a mobile or desktop device was used. We will make no attempt to identify individual visitors, or to associate the non-personal data with any individual

**The legal basis on which we process non- personal data** is that it is in our legitimate interests, to keep our website updated and relevant, to develop our business and to inform our marketing strategy.

### Personal Data

The ITAA uses member contact and other relevant personal information to provide membership services to member organisations, in accordance with the member's contract with the ITAA.

Central to the ITAA membership services is communication with its members to keep them informed and up to date on what the ITAA is doing on behalf of members and to seek members' views and input (including membership surveys) on issues of relevance.

While ITAA engagements with members are business to business, they contain some personal data (mainly member contact details). The legal basis for such data collection is to facilitate the necessary performance of the membership contract.

The ITAA will process any Personal Data you provide to us for the following purposes: -

- To process membership applications/renewal/event bookings
- To review and update our membership contact details
- To provide membership services
- To contact members if we are to respond to any communications from members
- To notify members of updates
- To provide members with eZines and newsletters for which you subscribe
- To invite you to events and opportunities that may be of interest to you
- To be considered for annual awards
- To display a member's business and contact information in the Membership List, member adverts (if the member has chosen to participate)
- To improve the services, events and information we offer
- To conduct normal recruitment processes
- To communicate with you about activities, publications and news that may be of interest to you;
- To improve the services, events and information we offer;
- To conduct normal recruitment processes;
- To provide you with membership services;
- To invite members to load offers onto [www.itaa.ie](http://www.itaa.ie) ;
- To share information relevant to trade operations and market trends.

### Members Legal Information Service

The ITAA Members Legal Information Service processes personal data only in so far as it is necessary to provide advice and information to the relevant member organisation. Confidentiality of the ITAA members legal information service is respected and maintained.

**The legal bases on which we process your personal data are that** the processing is necessary:

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- In our legitimate interests in the conduct of our business to ensure the proper management and functioning of the ITAA;
- To comply with a legal or regulatory obligation that applies to us; and
- To perform the membership contract or in order to take steps at the member's request prior to entering into a contract.

### Events

When you attend an ITAA event, we will need your name, email address, phone number, payment information and, in some cases, your dietary preferences. This information is used by us in organising and administering the event. We delete event attendance data within a maximum of [12] months (maybe less depending on the event).

### Disclosure of your personal data

Except as set out in this Privacy Notice, we do not disclose personal data that we collect about you, or which you provide to us, to any third party.

However, for the purposes set out in the section entitled **How we use your personal data** above, we may share your personal data, which will comprise names and business email addresses with the parties set out below:

- Third parties who we engage to provide services to us in connection with our website, [www.ita.ie](http://www.ita.ie) such as outsourced service providers, IT service providers, analytic service providers, digital marketing and professional advisers;
- To competent regulatory authorities and bodies as requested or required by law
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Notice.
- We require all third parties to whom we disclose personal data to respect the security of personal data and to treat it in accordance with the law. We do not allow our service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. Unless prevented by applicable law, we will notify you when your personal data may be provided to third parties in ways other than explained above, and you may have the option to prevent such sharing at the time that we notify you.
- To members and ITAA Affiliate Partners, where the member has opted-in to the disclosure of the nominate contact names and email addresses.
- To third party event organisers retained by the ITAA to organise member and trade events.

### How your personal data is secured

The ITAA is committed to maintaining the security of all personal data which is processed pursuant to this Privacy Notice. We maintain appropriate physical, procedural, organisational and technical security measures intended to prevent loss, misuse, unauthorised access, disclosure, or modification of personal data under our control, the transmission of information via the internet is not completely secure. We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. Data which we collect from you may occasionally be transferred to, stored and processed at a destination outside of the European Economic Area (the 'EEA'), and only where the appropriate assurances on the adequacy of data privacy protection commitments have been provided.

### Third Party Websites

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This Privacy Notice does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website to which our website contains a link. The inclusion of a link on the website does not imply endorsement of the linked website by us.

### Retention

We keep your personal data for no longer than is necessary for the purpose for which it was processed, as described in this Privacy Notice, or to comply with our obligations under applicable law and, if relevant, to deal with any claim or dispute that might arise between us.

We keep member contact details for as long as the member organisation remains an ITAA member and we review contact lists annually.

### Your legal rights

You have the following rights, in certain circumstances and subject to certain restrictions, in relation to our use of your personal data, including the right to:

- **Request access to your personal data.** You are entitled to receive a copy of the personal data we hold about you and to ensure that we are processing such data in a lawful manner.
- **Request correction of the personal data that we hold about you.** You are entitled to have any incomplete, outdated or inaccurate personal data we hold about you updated and corrected.
- **Request erasure of your personal data.** You have the right to request us to delete personal data that we hold about you. This is sometimes referred to as the right to be forgotten.
- **Object to processing of your personal data.** In certain circumstances, you may be entitled to object to our processing of your personal data where we are relying on a legitimate interest (or the legitimate interest of a third party) as the legal basis for such processing, if you believe that such processing impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** You are entitled to ask us to suspend the processing of your personal data in the following scenarios: (a) if you wish for us to establish the accuracy of the relevant personal data; (b) if our use of the personal data is unlawful but you do not wish for us to erase it; (c) if you require us to retain the personal data (even if we no longer require it) as the personal data which we retain is necessary for you to establish, exercise or defend legal claims; or (d) you have objected to our use of your personal data but we are required to retain it in order to verify whether we have overriding legitimate grounds to process it.
- **Right to data portability** – You have the right to request us to provide you, or a third party with a copy of your personal data for particular purposes.

If you wish to exercise one or more of your rights in respect of your personal data, please contact us using the Contact Us details below.

### Contact Details - Queries and Complaints

If you have any queries or complaints in relation to our processing of your personal data, you can contact us at [info@itaa.ie](mailto:info@itaa.ie)

All data subjects have the right to make a complaint at any time to the Data Protection Commission, the Irish supervisory authority for data protection issues ([www.dataprotection.ie](http://www.dataprotection.ie)). We would, however, appreciate the chance

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to deal with your concerns before you approach the Data Protection Commission, so please contact us in the first instance using the information listed in Contact Us below.

### Changes to this Notice

We will change this Privacy Notice from time to time and any changes will be posted to the ITAA website member's area. This version of the Privacy Notice was last updated on 28<sup>th</sup> of September 2018 and historic versions can be obtained by contacting us using the Contact Us details below.

Contact us:

Phone + 353 1 417 9696

Email [info@itaa.ie](mailto:info@itaa.ie)