

The Loughs Agency eLicence Privacy Policy

Last Updated 09/05/2019

INTRODUCTION

Welcome to Loughs Agency. This policy explains how we handle and use your personal information and your rights in relation to that information. Under the GDPR of May 2018, The Loughs Agency is the controller of that information.

The Loughs Agency (“The Organisation”, “we”, “our” or “us”) is committed to protecting and respecting your privacy.

This Privacy Policy explains why and how we will use the personal information that we have obtained from you or others, with whom we share it and the rights you have in connection with the information we use. Please read the following carefully.

This policy describes the way we handle and use the personal information that we obtain from all the different interactions you may have with us as a business, including when you visit our stores, social media pages or website currently located at www.loughs-agency.org or when you contact us.

The Loughs Agency is the controller in relation to the processing activities described below. This means that Loughs Agency decides why and how your personal information is processed. Please see the section at the end of this policy for our contact and legal information.

This policy was last updated on the date that appears at the top of this page.

1. PERSONAL INFORMATION WE COLLECT ABOUT YOU

We receive personal information about you that you give to us, that we collect from your visits to our offices, website and social media pages and that we obtain from other sources. We only collect personal information which we need and that is relevant for the purposes for which we intend to use it.

INFORMATION THAT WE COLLECT ABOUT YOU – AT OUR OFFICES, ONLINE, BY PHONE, SOCIAL MEDIA, AND EMAIL:

- Your name, title and contact details (email address, telephone number, postal address);
- Any information you include in correspondence you send to us or in forms you submit to us at our offices or when using our Site or social media pages;
- Details of your orders and purchases;
- Your marketing preferences;
- The opinions and other information you provide when responding to customer surveys;
- Any personal information included in your entries to competitions that we run;
- Your identification information when exercising the rights that you have in relation to our processing of your personal information (see further Your rights in relation to your personal information);
- Details of any transactions between you and us;
- Your payment card details and, in relation to certain refunds, your bank account details;

When you visit our Site we automatically collect:

- Details of your use of our Site namely traffic data, weblogs and statistical data, including where and when you clicked on certain parts of our Site and details of the webpage from which you visited it;

- The date and time you used our Site;
- The pages you visited on our Site and how long you visited us for;
- The website address from which you accessed our website;
- If we have asked for it, details regarding when and how you consented to receive marketing communications from us (including the time and date you provided your consent);
- Cookie, pixels and beacon identification information (for more information please see our [Cookie Policy](#)).

2. USE OF YOUR PERSONAL INFORMATION

We use your personal information for a variety of reasons. We rely on different legal grounds to process your personal information, depending on the purposes of our use and the risks to your privacy. You will only receive emails from us if:

(a) we have obtained your contact details in the course of a sale or negotiation for a sale of our products or services and you have not objected to receiving such direct email from us. Of course, we will only use your contact details to send you marketing emails that are based on similar products or services that you purchased from us and you will always have the opportunity to opt out at any time or

(b) if you have consented to receiving marketing from us (you can opt-out of receiving them at any time). We do not share your personal information with companies that would send their marketing to you.

We use your personal information in the following ways:

2.1 WHERE YOU HAVE PROVIDED CONSENT

We may use and process your personal information for the following purposes where you have consented for us to do so:

To contact you via email, online or by post (as you have indicated) with marketing information about our products, events, product launches, exciting offers and services.

You may withdraw your consent for us to use your information in any of these ways at any time. Please see the 'YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION' section below for further details.

2.2 WHERE NECESSARY TO COMPLY WITH OUR LEGAL OBLIGATIONS

We will use your personal information to comply with our legal obligations:

- To keep a record relating the exercise of any of your rights relating to our processing of your personal information.
- To ensure all anglers fishing in the Foyle and Carlingford areas are in possession of a valid Loughs Agency licence.
- To take any actions in relation to health and safety incidents required by law.
- To handle and resolve any complaints we receive relating to the services and products we provide.

2.3 WHERE NECESSARY FOR US TO PURSUE A LEGITIMATE INTEREST

We may use and process your personal information where it is necessary for us to pursue our legitimate interests as an agency for the following purposes:

- Processing necessary for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns;
- For analysis and insight conducted to inform our marketing strategies, and to enhance your visitor experience;
- To tailor and personalise our marketing communications based on your attributes;

- To fulfil and complete your orders, purchases and other transactions entered into with us;
- To contact you with targeted advertising delivered online through social media and other online platforms operated by other companies, unless you object. You may receive advertising based on information about you that we have provided to the platform or because, at our request, the platform has identified you as having similar attributes to the individuals whose details it has received from us;
- To send you electronic marketing information after you have purchased a product or service from us and opted into marketing or requested information of interest. At the time we first collect your details we will give you a simple way to opt out and object to our using your contact details to send you electronic marketing information and this option will be repeated in every subsequent marketing message we send you. We will only contact you with information about our own similar products and services, which we hope you will like. You have the right to object to us sending you this information at any time;
- To identify and record when you have received, opened or engaged with our Site or social media or other electronic communications (please see our Cookie Policy for more information);
- In some cases, we may use automated methods to analyse, combine and evaluate information that you have provided to us. We collect and analyse this information in this way so that we can deliver the most appropriate customer experience to you by tailoring and making relevant all our service and communications;
- Processing necessary for us to support you with your enquiries;
- To respond to correspondence, you send to us and fulfil the requests you make to us;
- Processing necessary for us to respond to changing market conditions and the needs of our Customers;
- To analyse, evaluate and improve our products and services so that your visit and use of our Site, social media pages and offices are more useful and enjoyable (we will generally use data amalgamated from many people so that it does not identify you personally);
- To undertake market analysis and research (including contacting you with customer surveys) so that we can better understand you as a customer;
- For product development purposes;
- Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively;
- To administer our Site, and our social media pages and for internal operations, including troubleshooting, testing, statistical purposes;
- For the prevention of fraud and other criminal activities;
- To verify the accuracy of data that we hold about you and create a better understanding of you as an account holder or visitor;
- For network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- To comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- For the purposes of corporate restructure or reorganisation;
- For efficiency, accuracy or other improvements of our databases and systems, for example, by combining systems or consolidating records we hold about you;
- To enforce or protect our contractual or other legal rights or to bring or defend legal proceedings;
- To inform you of updates to our terms and conditions and policies;
- For other general administration including managing your queries, complaints, or claims, and to send service messages to you.

2.4 WHERE NECESSARY FOR US TO COMPLETE ORDERS AND RUN COMPETITIONS

We will use your personal information where this is necessary for us to perform our contract with you or to carry out any pre-contract steps you've asked us to so that you can enter into that contract, for the following purposes:

- To process your payment card or bank details when taking payment for your orders or when providing a refund
- To process, fulfil and complete your orders, purchases and other transactions entered into with us and deliver your order and
- To run our competitions and promotions that you enter from time to time and to distribute prizes.

2.5 WHERE PROCESSING IS IN YOUR VITAL INTERESTS

We will use your personal information where this is in your vital interest to notify you of any product recall issues or in relation to making a catch return.

2.6 MARKETING COMMUNICATIONS:

If we have requested your consent and you give your consent, we may use your personal information to contact you by email, online or by post to notify you of special offers, promotions, competitions or new products and services. We try to adapt any marketing material that we send to you for example by notifying you of special offers or promotions that will be of relevance to you, apply to your interests and in your location (we do this by monitoring your browsing and online shopping habits and providing information on products you have viewed and related products).

If you do not wish to receive communications from us, please inform us by using the unsubscribe link inside the email, by sending an email to general@loughs-agency.org or by changing your preferences on your online account.

If you opt-out of receiving marketing communications from us, we keep your email address on our suppression list indefinitely to ensure that we comply with your wishes.

3. DISCLOSURE OF YOUR PERSONAL INFORMATION BY US

We only disclose your personal information outside our business in limited circumstances. If we do, we will put in place a contract that requires recipients to protect your personal information, unless we are legally required to share that information. Any contractors or recipients that work for us will be obliged to follow our instructions. We do not sell your personal information to third parties.

We may disclose your information to our third-party service providers, agents and subcontractors (Suppliers) for the purposes of providing services to us or directly to you on our behalf, including the operation and maintenance of our Site, and social media pages.

When we use Suppliers, we only disclose to them any personal information that is necessary for them to provide their services and only where we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

4. USE OF COOKIES AND GOOGLE ANALYTICS

This website uses Google Analytics, a web analytics service provided by Google, Inc. ('Google'). Google Analytics uses 'cookies', which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Further details on Google Analytics use of cookies can be found at:
<https://support.google.com/analytics/answer/6004245>.

5. TRANSFERS OF YOUR PERSONAL INFORMATION OUTSIDE OF EUROPE

Loughs Agency are assisted by third parties who may host your data outside of the EU, however this processing is protected to the extent required by the GDPR from both a security and contractual perspective.

We will also ensure that appropriate safeguards are in place for the transfer and storage as required by applicable law. This is because some countries outside of the EEA do not have adequate data protection laws equivalent to those in the EEA. If we transfer your personal information to the United States of America, we will only send the personal information to companies that participate in the Privacy Shield framework (or such other framework that may replace it from time to time) or for which we have an alternative safeguard in place in accordance with applicable law. Where they apply to our data transfer activities, we may rely on adequacy decisions by the European Commission about certain countries for data transfers to countries outside the EEA.

6. SECURITY AND LINKS TO OTHER WEBSITES

We take the security of your personal information seriously and use a variety of measures based on good industry practice to keep it secure. Nonetheless, transmissions over the internet and to our Site, and our social media pages may not be completely secure, so please exercise caution. When accessing links to other websites, their privacy policies, not ours, will apply to your personal information.

We employ security measures to protect the personal information you provide to us, to prevent access by unauthorised persons and unlawful processing, accidental loss, destruction and damage.

We use Internet standard encryption technology ("SSL", "TLS" and "Secure Socket Layer" technology) to encode personal data that you send to us when placing an order through the Site. To check that you are in a secure area of the Site before sending personal information to us, please look at the address bar of the website and check that it displays an image of a closed padlock or an unbroken key.

The transmission of information via the internet is not completely secure. Although we will do everything possible to protect your personal information, we cannot guarantee the security of any personal information during its transmission to us online. You accept the inherent security implications of using the internet and will not hold us responsible for any breach of security unless we are at fault.

If you are using a computer or terminal in a public location, we recommend that you always log out and close the website browser when you complete an online session for your security. In addition, we recommend that you take the following security measures to enhance your online safety:

- When creating a password, we recommend use at least 8 characters with a combination of letters and numbers.
- We recommend you frequently change your password.
- Keep your passwords private. Remember, anyone who knows your password may access your account.
- Avoid using the same password for multiple online accounts.
- We will never ask you to confirm any account or credit card details via email. If you receive an email claiming to be from Loughs Agency asking you to do so, please ignore it and do not respond and report it to us.

Our Site, and social media pages may contain links to other websites run by other organisations which we do not control. This policy does not apply to those other websites, so we encourage you to read their privacy policies. We specifically disclaim responsibility for their content, privacy practices and terms of use, and we make no endorsements, representations or promises about their accuracy, content or thoroughness. Your disclosure of personal information to third party websites is at your own risk.

7. THE PERIODS FOR WHICH WE RETAIN YOUR PERSONAL INFORMATION

We are obliged to retain certain information to ensure accuracy, to help maintain quality of service and for legal, regulatory, fraud prevention and legitimate business purposes.

If Personal Data is disclosed to us by you in connection with a general enquiry through the Loughs Agency Websites, for example where you enter your details into a website form or you send us an email, that Personal Data will be retained for a period of 6 months.

Other information will be retained for no longer than is necessary for the purpose for which it was obtained by us or as required or permitted for legal, regulatory, fraud prevention and legitimate business purposes. In general, we (or our service providers on our behalf) will hold this information for a period of seven years, unless we are obliged to hold it for a longer period under law or applicable regulations.

We will not hold your personal information in an identifiable format for any longer than is necessary for the purposes for which we collected it. For certain purposes we retain your personal information indefinitely (e.g. to suppress marketing messages).

8. YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

You have certain rights in respect of your personal data and we have processes to enable you to exercise these rights.

8.1 Right of Access

This is known as a Data Subject Access Request. If you want to know if we are processing personal data relating to you and to have access to any such personal data you can contact the Data Protection officer at dpo@loughs-agency.org. In order to furnish you with a copy of your personal data that we hold we will need to verify your identity.

You have the right to access any personal information that Loughs Agency processes about you and to request information about:

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

8.2 Right to Rectification

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

If you believe that we hold inaccurate personal data about you, then you can either update this information directly yourself by logging on to the My Profile section of the eLicence website. Depending on the type of personal data you believe is inaccurate, we may ask you for further proof to ensure that the personal data is being corrected properly. If we are satisfied that the personal data is inaccurate we will make the necessary changes.

8.3 Right to Erasure

You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

You have a right to ask for your personal data to be erased in certain circumstances. However, this right does not apply where we have to comply with a legal obligation or where we need personal data for the establishment, exercise or defence of legal claims. In addition, if you opt out of marketing communications or have previously opted out of marketing communications, we have to keep a record, or such opt out to ensure that we don't contact you in the future.

8.4 Right to Restriction

You have a right to request that processing of personal data is restricted in certain circumstances. However, we shall still continue to process the personal data for storage purposes, for the establishment, exercise or defence of legal claims or with your consent.

8.5 Right to Object

Where we are relying on legitimate interests as a legal basis to process your data, you have a right to object to such processing on grounds relating to your particular situation.

8.6 Right to Portability

In certain circumstances, you can request that we provide to you your personal data in a commonly used format. If you wish to make such a request, you can contact Loughs Agency on general@loughs-agency.org.

8.7 Right to Complain to the Data Protection Commissioner

You have the right to lodge a complaint with the ICO in Northern Ireland at Tel: 028 9027 8757 and Data Protection Commissioner in Ireland at Tel: +353 578 684 800.

For more information or to exercise your data protection rights, please contact us using the contact details above.

Please use below if applicable -

If you are unhappy about how your personal data has been used please refer to the complaints section on the website at general@loughs-agency.org.

If you object to our use of your personal data for marketing purposes, we will opt you out of marketing. You can do this by logging on to the My Profile Section of the eLicence website to amend your preferences or you can email us at – general@loughs-agency.org.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

9. CHANGES TO OUR PRIVACY POLICY

Please check this page regularly for changes to this policy.

You can contact us with your queries in relation to this policy or for any other reason by post, email or by phone.

Please email us at general@loughs-agency.org or call us on +44 (0) 28 71 342100.

You can also contact our Data Protection Officer at dpo@loughs-agency.org.