

IDA Privacy Notice (Grant Applications & Claims)

1. Background

This Data Protection Notice (“**Notice**”) sets out what personal data the Industrial Development Agency Ireland (“**IDA**”, “**we**”, or “**our**”) collect as part of the grant application and claiming process and how this personal data is used. This personal data relates to individuals who are engaged by or are otherwise connected with companies that apply for or which have been awarded IDA grants (“**Applicant Companies**”).

IDA is a controller of the personal data specified in this Notice. In order to provide grant aid and to administer grand aid applications, it is necessary to process personal data. Personal data is processed through communications you may have with us, due diligence carried out in relation to directors of Applicant Companies and the verification of posts pertaining to Employment grant aid and salary and expense information pertaining to RD&I, Training and De Minimis grant aid.

How do we collect information from you?

The personal data we receive may be received either **directly** or **indirectly**.

- **Directly:** In some instances, you provide your personal data directly to us. For example, if you act as an authorised representative of the Applicant Company, you may provide your contact details to IDA when completing the grant application forms or when you correspond with us.
- **Indirectly:** In other cases, we may receive your personal data from the Applicant Company as part of the grant process. For example, if you are a director of the Applicant Company, IDA will collect details of your other directorships. Or if you are employed by the Applicant Company under an IDA Employment, RD&I, Training and De Minimis Grant, IDA processes personal data which is required to verify eligible expenditure claimed.

2. What information do we collect and how do we use it?

The table below sets out the personal data which we may process may include some or all of the following, depending on the purpose of the processing:

Category of Data Subject	Types of personal data collected	Purpose
Authorised representative of Applicant Company responsible for submitting grant documentation.	Name Email Phone number	To contact you in relation to applications for grants and grant claims submitted.
Directors of Applicant Company	Name Address Directorships and shareholdings Biographical information	To carry out due diligence on officers of Applicant Company
Individuals engaged or otherwise connected with Applicant Company	Name and/or Employee number Salary Job title	To verify eligible expenditure claimed by the relevant Applicant Company.

3. Legal basis for processing

To process your personal data, IDA must have a legal basis to do so. It is necessary for IDA to process personal data to fulfil its statutory functions under the Industrial Development Acts 1986–2018.

In respect to the grant claim and applications process, IDA must process personal data to comply with our legal obligations under the Commission Regulation (EU) No. 651/2014 to assess grant applications and to process and manage the payment of grants.

4. With whom do we share your personal data?

IDA is audited by external agencies including the Comptroller & Auditor General and the outsourced provider of internal audit services. Records containing personal data may be sought for review as part of audits undertaken. IDA Grants may also be audited by the European Commission.

It may be necessary to share personal data with third parties who provide a service to us. Any third parties who access your data while providing services on our behalf are subject to strict contractual restrictions to ensure that your data is protected, in compliance with data protection law.

Where an Applicant Company transfers from the IDA portfolio to another state agency, the personal data relevant to an existing grant claim will be transferred also.

We may also disclose your personal data in response to a valid, legally compliant request by a competent authority or in response to a court order or otherwise in compliance with the applicable law under which the request has been made.

5. Where we store your personal data

Personal data submitted as part of a grant application or claim process is not transferred outside the EEA. All information you provide to us is stored on our secure servers or in manual form.

6. Retention of personal data

Personal data received either directly or indirectly to assess grant applications and claims is retained for the longer of

- a. the period mandated by EU state aid law; or
- b. the duration of the grant agreement.

7. What rights do you have?

The list below sets out the rights which you have in relation to data protection. Please note that these rights are not absolute and are subject to certain exemptions under applicable data protection law.

As a data subject, you have the following rights under data protection law:

- the right to know what personal data we process about you and how we use this personal data;
- the right to obtain a copy of the personal data we hold about you;
- the right to have any inaccurate personal data which we hold about you updated or corrected;
- the right to have personal data concerning you deleted unless we are required to continue processing it;
- the right to object to the processing of your personal data in certain circumstance;
- the right to restrict the processing of your personal data in certain circumstances;
- the right to transfer your data to another controller in a machine-readable format without hindrance;
- the right not to be subject to automated processing which produces legal effects.

8. Right to complain

If you do not think that we have processed your personal data in accordance with this Notice, please contact us in the first instance. If you are not satisfied, you have the right to lodge a complaint with the Office of the Data Protection Commissioner or exercise any of your other rights pursuant to data protection law. Information about how to do this is available on the DPC website at <https://www.dataprotection.ie>.

9. Changes to this Notice

This Notice may be updated from time to time, so you may wish to check it each time you submit personal data to us. The date of the most recent revisions will appear on this Notice.

10. How to contact us

If you need to contact us regarding any of your rights as set out in this Notice, all such requests should be made in writing to The Data Protection Officer at IDA Ireland, Wilton Park House, Wilton Place, Dublin 2, or by email to dpo@ida.ie.

16th April 2019