

# Sustainability Matters CLG T/A International Sustainable Finance Centre of Excellence

This is the Privacy Policy of Sustainability Matters CLG T/A International Sustainable Finance Centre of Excellence [hereafter 'Sustainability Matters'] and is to be read in conjunction with our Cookie Policy. Sustainability Matters is committed to protecting and respecting your privacy. This policy (together with our terms of use) and any other documents referred to on it, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat your data.

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## 1. Who are we?

For the purposes of the General Data Protection Regulation (EU) 2016/379 ['GDPR'] and the Data Protection Act 2018, the data controller is Sustainability Matters CLG of The Black Church, St. Mary's Place, Dublin 7, D07 P4AX. This policy sets out how we, as a data controller, collect and process personal data about:

- Visitors to our websites.
- Business referrals passed to us.

- Individuals who we communicate or interact with in the course of our business.
- Individuals who provide us their personal data in the provision of our services or responding to enquiries about our services (e.g. members of the public, enquirers, stakeholders, etc.).
- Employees, potential employees, or people who apply for jobs with us.

This policy also sets out information about data subject rights and our obligations under data protection law. We may use optional cookies to enable user movement around our website, to optimise site functionality, and give you the best possible experience. We only set strictly necessary cookies by default, and you can accept optional cookies if you wish. For more information, please see our Cookie Policy. This policy also applies to our social media pages, content, or posts that we may publish and any social media user who responds to the same.

## 2. Why we collect information about you

In order to carry out our business functions, including knowledge resources, training programs, or thought leadership events, either online or in person, we need to collect and use personal information about the individuals who engage with us. Most of the personal information we process is provided to us directly by you or referred to us, for one of the following reasons:

- To enter into, or at your request taking steps to enter into, a contractual relationship for services and/or products.
- To respond to any inquiries made by you.
- To provide information or marketing communications about our organisation and/or events.
- To provide information or communications about sustainability matters, climate change, or our other stated purposes regarding sustainability and climate change.
- To lobby stakeholders, the legislator, or government about sustainability, sustainability matters, and/or climate change.
- To respond to emergency situations in order to provide assistance or protect the vital interests of a data subject on a case-by-case basis.
- To investigate any suspected or actual unauthorised use of our services and/or products.
- To prevent, monitor, investigate, and/or report any suspected criminal activities to An Garda Síochána.
- To protect the vital interests of data subject on a case-by-case basis.
- To provide reasonable accommodation, where applicable, under the Equal Status Acts and/or the Employment Equality Acts on a case-by-case basis.
- To comply with a legal obligation to which we are subject.
- For the purpose of any legitimate interest pursued by us on a case-by-case basis.

- For any other purpose that is permitted under Art. 6.1 and/or Art. 9.1 of GDPR on a case-by-case basis as applicable under the circumstances.

**Your personal data is collected by us when:**

- You voluntarily provide us with your personal data throughout any interaction with us.
- When you contact us with a query or request.
- When you visit our offices.
- When you write, email, or phone us.
- When you contact us via our websites.
- When you contact us via a third party who acts on your behalf (e.g. solicitor, agent, etc.).

**We also receive personal information indirectly in the following scenarios:**

- Any referrer who refers you to us in order for us to contact you.
- Any information provided by a user's legal representative or agent (e.g. solicitor) to provide services and/or respond to inquiries.
- For monitoring and reporting activities relating to our services.
- In connection with lobbying to nominated individuals pursuant to the Regulation of Lobbying Act 2015, from publicly available information online.
- Where a contact, employee, or agent of ours gives your contact details as an emergency contact, nominated point of contact, or a referee.

### 3. The information we process about you

- Identity: Name, surname, title, and other identifying information provided by you.
- Details left in voicemails or messages to Sustainability Matters.
- Details provided when you contact us through our webform on our websites.
- Contact information: Address, email address, phone number.
- Nominated contacts, agents, referees, or legal representatives a person nominates as a point of contact, including details of successors, assignees, or authorised legal representatives.
- Supplier details: Contact information, bank details, VAT details, and tax clearance information.
- Stakeholder details: Contact information, role, meeting minutes/notes.
- Website user statistics (Google Analytics): Location, time, date, and details of your visit to our website (as anonymous statistics). Please see our Cookie Policy for more information.
- CCTV images at our offices.
- Information in relation to subject access requests (including proof of identity if required).
- Responses to surveys.

- Recruitment details: Applicant CVs, credentials, references, etc., tax and bank details of successful applicants.
- Marketing information: Where you have requested updates or on the basis of our legitimate interests, we will contact you with relevant information until such time as you opt-out of communications.
- Any information, health data, or special categories of personal data, voluntarily provided to us by a person for the purposes of requesting or providing reasonable accommodation under the Equality Acts and/or the Employment Equality Acts on a case-by-case basis as necessary under the circumstances.

## 4. Why we use your information

We fully respect your right to privacy and, in addition to the above, will only collect or process your personal data, where required, for one or more of the following purposes (or lawful basis for processing):

**Our legitimate interests and to run our organisation on a day-to-day basis including to:**

- Contact stakeholders: Business contact information relating to stakeholders (e.g. business card information, contact details, role/position in company, etc.) are processed for legitimate business-related purposes.
- Compile and process your information for audit, statistical, reporting or research purposes (including, in some instances, making your data anonymous) in order to help us understand market, sustainability or climate trends.
- Protect our business, reputation, resources and equipment and manage our network systems, and information.
- Provide security and prevent and detect crime, fraudulent activities and/or wrongdoings, including using CCTV at our premises.
- Manage and administer our legal and compliance affairs.
- Managing and responding to complaints about us.
- Effectively manage the functionality and usability of the website.
- To make reasonable accommodation under the Equality Acts and/or the Employment Equality Acts as applicable on a case-by-case basis.
- For the purposes of investigating or deciding any employee grievance and/or disciplinary procedure and/or providing an outcome of same.
- To provide information or marketing communications about our organisation and/or events.
- To provide information or communications about sustainability matters, climate change, or our other stated purposes regarding sustainability and climate change.

We will only process your personal data for the purposes for which they were originally collected, and it will only be processed further for the following closely related business purposes:

- Transferring the personal data to an archive.
- Conducting internal audits or investigations.
- Implementing business controls.
- Conducting statistical analysis or research as required.
- Preparing for or engaging in dispute resolution.
- Using legal or business consulting services.
- Managing insurance issues.

**To enter into a contract, or to take steps to enter into a contract, or to fulfil the terms of a contract:**

- To provide information to prospective users or clients of our products and services.
- To provide our products and services to a part, user or client on foot of a contract with Sustainability Matters.
- To provide follow up services, aftercare, review of products and services, to a party on foot of a contract with Sustainability Matters.
- To ensure payment of any moneys due to Sustainability Matters.
- Engaging service providers and suppliers and for the provision of and payment for goods and services.
- Filling vacant positions and for the engagement and payment of employees.
- For the purposes of investigating any employee grievance and/or disciplinary procedure and/or providing an outcome of same.

**Complying with our legal obligations, such as:**

- Preparing returns to relevant authorities including preparing income tax, VAT3 and other revenue returns.
- Making reasonable accommodation, where applicable and on a case-by-case basis, under the Equal Status Acts.
- Making reasonable accommodation, where applicable and on a case-by-case basis, under the Employment Equality Acts.
- Complying with your data protection rights under GDPR.
- Complying with legal requests or investigations from regulatory bodies, e.g. the Data Protection Commission.
- Facilitating employees making of a protected disclosure(s) under the Protected Disclosures Act 2014.
- Complying with the Regulation of Lobbying Act 2015.
- To investigate or report a notifiable incident as mandated by the Health and Safety Authority and/or the Health, Safety and Welfare at Work Act 2005.
- To prevent, monitor, investigate and/or report any suspected criminal activities to An Garda Síochána.

- Complying with any court order.
- Any other legal obligation not stated here.
- To protect the vital interests of a person and/or Sustainability Matters as applicable on a case-by-case bases.
- To report any suspected criminal activity to An Garda Síochána.
- To initiate, continue with or defence any legal claim or prospective legal claim.
- To obtain legal advice on a specific matter.
- To investigate, monitor or prevent any unauthorised or illegal use of Sustainability Matters products or services.

## 5. Who we share your information with

We only share your information when it is necessary for a lawful purpose under GDPR. We will not share your information with any third parties for the purposes of direct marketing. Sharing can occur in the following circumstances and with the following organisations.

- A data subject's nominated contact persons (e.g. solicitor, agent, etc.).
- Mandated bodies under statute, e.g. An Garda Síochána, etc.
- If you ask us to share your personal data with a third party in furtherance of a contract with Sustainability Matters, to respond to an enquiry, in compliance with our business objectives and/or with a user's explicit consent.

Data processors who are third parties who provide services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us unless instructed to do so. They will hold it securely and retain it for the period we instruct.

Website Analytics: When you visit [www.isfcoe.org](http://www.isfcoe.org) we use a third-party service, Google Analytics, to collect standard statistical information and details of visitor behaviour patterns. We do this to find out such things as the number of visitors to the various parts of the site. This information is only processed in a way that does not directly identify anyone. Please see our Cookie Policy for more information.

## 6. How long we hold your information

We will keep your personal data for as long as it is necessary to fulfil the purposes for which it was collected as described above and in accordance with our legal and

regulatory obligations. The length of time we hold your personal data depends on several factors such as:

- The type of data we hold about you.
- Whether there is a legal obligation to hold the data for a minimum specified period.
- Where there is a sound evidence-based reason to hold the data for a specified period.

Generally speaking, Sustainability Matters has a personal data retention period of seven years after a person last contacts Sustainability Matters, engages with or has a contract with Sustainability Matters. The seven-year data retention policy is based on legal advice to Sustainability Matters.

## 7. Processing your information within and outside of the EEA

We do not routinely store personal data outside the EU or EEA. We store data on EU based servers that are based in other EU countries and are still protected by GDPR by application of the Data Protection Commission's "One Stop Shop Mechanism" with the Irish Data Protection Commission as the lead National Supervisory Authority. We may, and reserve the right to, on a case-by-case basis and only where necessary store data outside the EU but would do so with a GDPR compliant mechanism in place such as the EU-US Data Privacy Framework, Standard Contractual Clauses and/or an EU adequacy decision. For more information on the Data Protection Commission's "One Stop Shop Mechanism", EU-US Data Privacy Framework, Standard Contractual Clauses and EU adequacy decisions, please visit the Data Protection Commission's website at [www.dataprotection.ie](http://www.dataprotection.ie)

## 8. What are my rights when you process my data?

You have a number of rights in relation to your personal data. You may request access to your data, correction of any mistakes in our files, erasure of records where no longer required, restriction on the processing of your data, objection to the processing of your data or the basis for any international transfers. Sustainability Matters does not engage in any automated processing, automated decision making or profiling of data subjects.

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Data Protection  
Sustainability Matters  
The Black Church  
St. Mary's Place  
Dublin 7  
D07 P4AX

Or email your request to [info@isfcoe.org](mailto:info@isfcoe.org).

You also have the right to complain to the Data Protection Commission at [www.dataprotection.ie](http://www.dataprotection.ie) or:

Data Protection Commission  
21 Fitzwilliam Square  
Dublin 2  
D02 RD28

We would kindly ask you to email us first at [info@isfcoe.org](mailto:info@isfcoe.org) before contacting the Data Protection Commission so we can try to resolve any issue to your satisfaction.

## 9. Contact us

The primary point of contact for all issues arising from this Policy, including requests to exercise data subject rights, is our Data Protection point of contact. You can get in touch by emailing us at [info@isfcoe.org](mailto:info@isfcoe.org).

Once we receive an enquiry or request from you, we will try to complete it within a month but reserve the right to rely on an additional two months to reply under GDPR.

Last review: [•]

This Policy may be updated without further notice. Users are encouraged to review all Sustainability Matters policies regularly.

This Privacy Policy was drafted by Argent Business Consultants and used by licence by Sustainable Matters CLG.

[www.argentbusinessconsultants.ie](http://www.argentbusinessconsultants.ie)