

## Airfield Estate Privacy Policy

### Introduction:

Airfield Estate is strongly committed to protecting your privacy and the purpose of this privacy policy is to explain, in a clear and transparent manner, what data about you we collect, why we collect it, how we use it and how we deal with your data protection rights..

This Privacy Policy applies to any personal data we collect and process about you in connection with your engagement with Airfield as a customer/visitor (whether paying or otherwise) and through your use of our website and various social media applications.

### Data Controller:

Airfield Estate (“Airfield”) in this policy refers to Airfield Estate D.A.C. which is registered in Ireland with registration number 21980 and with registered offices at Airfield Estate, Overend Way, Dundrum, Dublin 14. In circumstances where we decide how and why personal information is collected and processed, we are regarded as the “data controller” of your information.

### What personal data we collect:

Personal data means any information relating to you which allows us to identify you, such as name, address, email, contact telephone number, payment details, age range and information about your access to our website.

Depending on how you have engaged with us, we may collect the following information:

- **General enquiries via our website** – you provide us with your name, email address and telephone number when you visit or use our website and submit a query.
- **Newsletter subscription request via our website** – you provide an email address.
- **Membership Data** – you provide name, address, email and telephone number- we take a photographic image of you so we can identify you as the lead member.
- **Education** – on our Education Feedback Form, if you have consented to receive communications from us, you will be asked to provide an email address.
- **Online, ticket desk and telephone bookings for events, courses, camps, etc:** -  
When you purchase tickets via any of the above channels (with the exception of day visitor tickets and memberships), your name, email, phone number and address will be stored by

our ticketing partner, Ticketsolve. In some cases, you may be required to provide an age (not date of birth) or age range in order to deliver an age-appropriate service/product.

In order to process payment, your payment data is shared between Airfield, Realex (payment gateway) and Ticketsolve (ticketing platform). Where you have given clear consent to receive communications from us, your data will be shared with Mailchimp (our email automation platform).

Ticketsolve acts as a “data processor” on behalf of Airfield (the “data controller”).

Ticketsolve, Realex, Mailchimp and Airfield have implemented appropriate technological measures to protect against accidental loss, destruction, damage, alteration or disclosure of your data.

If you are booking an educational camp, then in your capacity as parent/guardian, you provide a child’s name, address, email, month and year of birth, special dietary requirements, plus details of any health or allergy information that you feel we should be made aware of. We recognise the importance of taking extra care to protect the privacy and safety of children. Children under 16 are not permitted to book online using our website nor can they provide their own consent.

- **At events and for marketing** - you provide us with your information such as your name, place of work and contact details, when you sign up to or attend our events or otherwise engage with Airfield. In the case of large public events and festivals held on the estate, we may photograph or video patrons anonymously in order to advertise and further promote our activities.
- **CCTV footage** - CCTV is used by Airfield throughout the estate as part of the operational system for safety and security. The primary purposes of having CCTV are for fraud prevention, security and health and safety reasons.
- **When submitting a curriculum vitae (CV)** – you provide us with certain personal information when you send us your CV so we can consider you for roles at Airfield.
- **Automatically from your device** – we automatically collect certain information from your browser or device when you use certain Services or read a message from us. For example, we collect data regarding the device you’re using, such as its unique identifier and operating system; logs will be recorded by our servers based on the information sent from your app or

browser; and information may be recorded by cookies and similar technologies when you use the Services.

- **From third parties** – we receive information from other third parties, which may include information about you. For example, we may receive information from regulatory authorities and other public bodies.

Personal details about your physical or mental health, alleged commission or conviction of criminal offences are regarded as “sensitive” personal data under GDPR. We will only process such data if you have given your explicit consent, or it is necessary (for instance if you request special assistance on the estate) or you have deliberately made it public.

*Our legal basis for processing your personal data:*

We will only process your data where we have a legal basis to do so. We rely on a number of legal bases to collect, use, share and otherwise process the information we have about you for the purposes set out in this Privacy Policy. We may process your information where:

- use is necessary in order to deliver our activities (whether paid or unpaid)
- further to your consent where you have clearly and unambiguously given it (which of course you may withdraw at any time);
- if necessary to comply with a legal obligation, a court order or to exercise and defend legal claims, or
- use is necessary for the purpose of our or others’ legitimate interests.

In exceptional circumstances, we may also process your information:

- to protect your vital interests, or those of others; and
- where necessary in the public interest.

*Our legitimate interests:*

In certain cases, we use your information to pursue our and others’ legitimate interests, which include:

- **Marketing:** we use your information as necessary in accordance with our legitimate interest to advertise, promote, publicise and market our range of activities
- **Providing and improving our activities:** we use your information as necessary to pursue our legitimate interests in providing, developing and improving our activities.
- **Safety and security of our staff, customers and property:** we take safety and security seriously. We rely on both our and your legitimate interests to monitor the safety and security of IT systems to protect against fraud and ensuring network and information security.

*How we use your information:*

We use the information you provide us to help us operate, provide, improve, understand, customize, support and market our activities. We use the information we have about you in the following ways and for the following purposes:

- **Providing the activities and services you request,** for example educational school tours, membership services, courses, workshops, conferences, etc.
- **Maintaining and using relevant IT systems,** in particular systems which we use to enable us deliver the activities;
- **Credit or payment card information,** for billing and audit purposes and to detect and/or prevent fraud;
- **Contacting you,** including providing information about event changes or cancellation. Such communications are not for marketing purposes and cannot be opted-out of;
- **Analysing request and usage patterns** so that we may enhance the content of our Services and improve website navigation. When sending emails, we may carry out certain analytics on the messages sent, such as whether the message has been opened, how many times it has been opened, and your topic preferences;
- **With your express consent,** to contact you with information about Airfield's activities, services and events, and other information which may be of interest to you. You may unsubscribe from our mailing list at any time by contacting us or clicking on the 'Unsubscribe' link at the foot of any of our emails; and
- **Legal obligations,** such as to comply with any requirement of laws and other regulations

We may also process, retain and share your information if we believe in good faith that it is reasonably necessary to protect the safety of any person, to address fraud, security or technical issues, to protect our rights or property, and/or to investigate or assist in preventing any violation or potential violation of the law or this Privacy Policy.

We do not collect or compile information for sale to any outside parties for consumer marketing purposes.

### Sharing information:

Your information may be transferred to third party service providers who process information on our behalf, such as providers of information technology, website hosting and management, data analysis, data back-up, security and storage services.

### International transfers:

As outlined above, we use Mailchimp as our email automation platform, which is US based. Mailchimp participates in and has certified its compliance to the EU-US Privacy Shield framework, which in simple terms means that Airfield can lawfully transfer EU personal data to Mailchimp within a trusted and secure environment.

### Security:

We recognise that your information is important to you and we take appropriate measures to protect your information while it is in our care. We have implemented appropriate technical and organisational security measures in order to protect your information from unauthorised or unlawful disclosure, loss, misuse, alteration, destruction damage to such information.

We may disclose your information to trusted third parties only for the purposes set out in this policy. We require all such third parties to have appropriate technical and operational security measures in place to protect your personal data.

### Data retention:

We retain your information only for as long as necessary to fulfil the purpose it is being processed for.

We are also required to retain your information to comply with our legal obligations or to deal with complaints, queries and to protect our legal rights in the event of a claim being made. When we no longer need your personal data, we will securely delete or destroy it. We will also consider if and how we can minimise the personal data that we hold and also if we can anonymise your personal data so that it can no longer identify you.

### Your rights:

Individuals have certain rights over their information and controllers are responsible for fulfilling these rights. As outlined, in certain circumstances, we act as a controller of your information. We have therefore provided information below about the rights that individuals have and how to exercise them.

### *Access to information*

We like to keep your information accurate and up to date. If you would like to access or update your information, or you would like details of the information which you have submitted to us, please do so via the original registration page or please email us at [dp@airfield.ie](mailto:dp@airfield.ie).

If we are informed that any information we hold is no longer accurate, we will make appropriate corrections based on the updated information provided.

### *Restriction, Rectification and Deletion*

You can request that we restrict, rectify or limit our processing of your information by contacting us. You can also request that we delete your information.

### *Objection*

If we process your information based on our legitimate interests explained above, or in the public interest, you can object to this processing in certain circumstances. In such cases, we will cease processing your information unless we have compelling legitimate grounds to continue processing or where it is needed for legal reasons.

If you no longer want to receive our marketing emails, you can always opt-out by contacting us or by clicking on the unsubscribe link in the relevant email which you have received.

### *Withdrawal of consent*

Where we've asked for your consent to process your information, and you want to withdraw that consent, you can do so at any time. To withdraw consent to our processing of your information please email us at [dp@airfield.ie](mailto:dp@airfield.ie)

In certain cases, we may continue to process your information after you have withdrawn consent if we have a legal basis to do so or if your withdrawal of consent was limited to certain processing activities.

### *Complaints*

We hope that you won't ever need to, but if you do want to complain about our use of your information, please send an email with the details of your complaint to [dp@airfield.ie](mailto:dp@airfield.ie).

You also have the right to lodge a complaint with the Data Protection Commission ("**DPC**"), the Irish data protection regulator. For further information on your rights and how to complain to the DPC, please refer to the DPC website.

### *Cookies:*

When someone visits our website ([www.airfield.ie](http://www.airfield.ie)) we use a number of third party services to collect information about how visitors use our website. We use this information to compile reports and to help us improve the website. Cookies collect information in an anonymous form, including the number of visitors to the website, device used, where visitors have come to the website from and the pages they visited.

You can prevent the setting of cookies by adjusting the settings on your browser. Disabling cookies may result in the disabling of certain functionality and features of our website (and possibly other websites that you visit).

*Changes to Privacy Policy:*

Our Privacy Policy may change from time to time and any changes to this policy will be communicated to you by way of an email or notice on our website.

*Our contact information:*

If you have any questions about this Privacy Policy or how and why we process information, please contact us at:

Data Protection Team

Airfield Estate

Overends Way

Dundrum

Dublin 14

Or by email: [dp@airfield.ie](mailto:dp@airfield.ie)