



# PRIVACY STATEMENT

CITY OF DUBLIN ENERGY MANAGEMENT  
AGENCY T/A CODEMA  
VERSION 1.0

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## 1.0 About Us

Codema is a not-for-profit limited company set up in 1997 under the SAVE II Programme of the European Union. It was one of 14 local energy agencies set up around Ireland to help local authorities meet their energy performance targets through professional development and implementation of good and best practice. Today, we work with Dublin City Council, Dún Laoghaire–Rathdown, Fingal County Council and South Dublin County Council in the areas of energy management and financing, energy policy, climate change and energy awareness.

## 2.0 Scope

Codema has updated its privacy statement in response to the new GDPR. This policy will be reviewed annually and is available publicly on Codema’s website.

Personal data kept by Codema relates to:

### 2.1 Employee data

Employee data of current and past staff where there is a legitimate case for retaining such data and

### 2.2 Other personal data

For example:

- Mailing lists for marketing purposes, specifically to inform you about products, services and events, which we think might be of interest for you
- Curriculum Vitae (CVs) received either through a recruitment drive or via email,
- Indirectly, website cookies collected by our website to enhance user experience

Codema has internal policies in place to ensure that all staff are aware of their obligations in relation to GDPR and to ensure that staff are aware of the procedures and processes that are in place, e.g. in relation to data breach, risk assessment and request for information.

As our core activity does not consist of data processing operations, there is no requirement for Codema to appoint a Data Protection Officer.

For all queries in relation to Codema’s Privacy policy, please contact:

Edel Giltenane  
Executive Manager  
Codema  
[edel.giltenane@codema.ie](mailto:edel.giltenane@codema.ie)

## 3.0 Data protection principles

Codema is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

## 3.1 Access requests to personal data

- All requests regarding personal data such as Subject Access Requests, deletion, rectification and all queries should be directed to the Executive Manager either by email or in writing
- The Executive Manager will ensure that the request will be handled efficiently and will respond within the required time. All Subject Access requests will be delivered in a structured, commonly used and machine readable format

## 3.2 Lawful purposes

- All data processed by the Codema will only be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate
- Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data
- Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent will be clearly available and systems are in place to ensure such revocation is reflected accurately by Codema

## 3.3 Data minimisation

- Codema shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

## 3.4 Accuracy, retention & transparency

- Personal data is only used for the purposes for which it was originally collected and we only collect what is necessary for the purposes for which it is processed
- Codema will endeavour to keep the information up-to-date and accurate.
- We will not keep any personal data for longer than is necessary
- When we collect personal data we will inform the data subject of their rights under the

GDPR, e.g. their right to withdraw consent at any time.

## 3.5 Archiving / removal

- To ensure that personal data is kept for no longer than necessary, Codema shall review the requirements around the data we hold on an annual basis and consider what data should/must be retained, for how long, and why.
- When we no longer require to keep personal data, the data will be either anonymised or destroyed securely, using shredding facilities and permanently removed from all devices
- In relation to CVs received via email, we will request the sender to confirm their permission to keep their CV for a period of 6 months, after which the information will be deleted

## 3.6 Security

- Codema shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- Access to personal data shall be limited to personnel who need access and appropriate security will be in place to avoid unauthorised sharing of information.
- When personal data is deleted this will be done safely such that the data is irrecoverable.
- Appropriate back-up and disaster recovery solutions are in place.

## 3.7 Breach

- In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Codema shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the Irish Data Commissioner.

## 3.8 Data Processor Agreement

- Codema has a Data Processor Agreement in place with our website providers to ensure that appropriate data protection obligations are in place
- In this Agreement our website providers confirm that they are and their sub-processors are all GDPR compliant and shall on an ongoing basis monitor and control its Sub-Processors' compliance with the Applicable Law

## 3.9 Cookies

Small pieces of information known as cookies will be installed on your computer to collect statistical information including navigation paths, number of visits, returning customers and hits per page. The only personal information that a cookie can contain is information that you provide yourself. They cannot read data off your hard disk. We use these cookies to help us determine the usefulness of the information that we provide and to see how user-friendly our website is. Codema does not share the information that it gathers from cookies with other non-Codema entities or sell it to third parties. If you prefer not to receive cookies from our website, you can set your browser to warn you before accepting cookies and refuse the cookie when your browser alerts you to its presence. You can also refuse cookies by turning them off in your browser. You are required to have cookies turned on to enable you to use the My Alerts section of the Codema Websites.

## 3.10 Definitions

**GDPR:** The General Data Protection Regulation (2016/679) is the new EU Regulation on Data Protection, which will come into force on the 25th May 2018.

**Personal Data:** Information relating to a living individual who is, or can be, identified by that information, including data that can be combined with

other information to identify an individual. This can be a very wide definition, depending on the circumstances, and can include data which relates to the identity, characteristics or behaviour of an individual or influences the way in which that individual is treated or evaluated.

**Data Controller:** A Data Controller is the person or organisation who decides the purposes for which, and the means by which, personal data is processed. The purpose of processing data involves 'why' the personal data is being processed and the 'means' of the processing involves 'how' the data is processed.

**Data Processor:** A person or organisation that processes personal data on the behalf of a data controller.

**Processing:** means performing any operation or set of operations on personal data, including:

- obtaining, recording or keeping data
- organising or altering the data
- retrieving, consulting or using the data
- disclosing the data to a third party (including publication)
- erasing or destroying the data

**Data subject:** A Data subject is the individual the personal data relates to.

**Consent:** Article 7 of the GDPR has altered the conditions needed for consent as a legal basis for data processing to be valid. It is now necessary to consider whether consent was freely given and the data subject must have the opportunity to withdraw consent for processing at any time. Consent should not be assumed and must be obtained before data processing begins (e.g. through Privacy Notices). When processing the data of children in the context of online services, it is necessary to ensure that their age is verified and the consent of a legal guardian must be obtained. In Ireland, the Government is proposing that the age of digital consent, below which parental consent will be necessary, will be thirteen.