Privacy Policy

At CiviQ we take great care to protect the privacy of users of this consultation platform, *OpenConsult,* which we refer to as the (“platform”). We process the data you provide when you engage in pubic consultations to the data controllers of this platform.

This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Who we are

In this privacy policy, the terms "we", "our" and "us" are used to refer to Aphelion t/a CiviQ, 225 MaynoothWorks, Maynooth University, Maynooth, Co. Kildare company number 518067. You can contact us regarding this Privacy Policy at info@civiq.eu.

How we collect your information

CiviQ collects personal information from you to facilitate your responses to public consultations and engagement with other respondents. We do in the following ways:

- Directly from your written input to the platform via the registration form, submission forms, survey forms and comment boxes;
- Automatically through the platform’s technologies including tracking online, such as by web cookies (which are small text files created by websites that are stored on your computer)

The information you provide

We collect and process the following information about you from your use of the platform:

- Contact details, including your name, email address, postal address, website and telephone number;
- Organisational affiliation if you are registering an organisation or a company;
- Gender and age;
- Usernames and passwords;
- Website security roles to allow you to securely perform some limited functions within the CiviQ platform;
- Tracking codes, such as cookies;
- Submissions, comments, emails, feedback about the platform, indicators of support to other users, and other content you provide via the platform;
- Consent to receive emails from subscriptions, notifications and messages including date and time of consent;
- Anonymised Internet Protocol (IP) addresses used to connect your computer to the Internet;
- Account creation and last log-in date and time;
- Logging acceptance of the Privacy Policy and other Terms and Conditions;
- Audit of moderation activity on your submission by the data controller

If you make a submission to some types of consultation, there is or may be a requirement to provide your name and address. The platform therefore requests therefore these details at log in to facilitate your participation in all types of consultation, in an efficient and effective manner.

Some types of communications from the platform require your consent. These include messages and notifications. You may choose to receive notifications about consultations; system messages and notifications or withdraw consent to the same.

What we need and why we need it

We may use information we hold about you in the following ways:

- **Information you give us**. We will use this information:
  1. to carry out our obligations to process your responses to public consultations;
  2. to provide you with information;
  3. to notify you of confirmation that we have received your response to a consultation;
  4. to notify you about changes to any of our services;
  5. to communicate with you to gain feedback on the platform in order to improve it as a tool for public consultation;
  6. to ensure that content from the platform is presented in the most effective manner for you and for your computer;

- **Information we collect about you**. We will use this information:
  1. to administer our site and for internal operations, including troubleshooting and testing.
  2. to improve our site to ensure that content is presented in the most effective manner for you and for your computer or mobile device;

3. as part of our efforts to keep our site safe and secure; and
4. data analysis to help improve the reach and inclusiveness of public consultations using third party services such as Google Analytics.

Our legal basis for using your information

The legal grounds on which we rely to use collect and process your information are:

- **To allow the data controller to exercise their legitimate interests with regard to public consultations** : The data controller has legitimate interest to process your personal information, provided through the platform or through written/email responses in order to enable your participation in public consultations.
- We rely on the data controller's legitimate interests to process your personal information, which you provide to us on feedback forms, and to process personal information that we collect from you when you use the platform. It is also in their legitimate interests to process your information in to order administer the platform, to ensure that content from the platform is presented to you effectively and securely, so that you can respond and engage online in public consultations.

How long we hold your data

We hold you submission data for the period indicated by the data controller. After that period, your personal information will be removed except for your consultation responses. These will be anonymised and kept on public record.

Storage of your information, international data transfers and security

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

The transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

Most transfers of data will be within the European Union and therefore covered by GDPR. In the case where transfers may be made outside the EU, for example for development or software testing purposes, we will ensure the recipients are adhere to the requirements of the GDPR. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Policy and all applicable data protection laws.

Disclosure of Your Information

We will not share your information with third parties. However some contracted third parties may occasionally have access to areas of the site where your data is stored for the purposes of providing the platform service, development, testing and fixing of the platform. In these cases, the third parties will also be bound by data protection agreements that comply with the GDPR.

Automated decision-making

We do not use your personal data to undertake any automated decision-making.

Cookies

For more information on how we use cookies, please see our ***Cookie Policy***.

Your rights

You have certain rights in relation to your personal information that is processed by us. These rights are listed below. These rights are not absolute and apply subject to certain conditions. For example, your rights may include:

- the right to access personal data held by us about you;
- the right to require us to rectify any inaccurate personal data held by us about you;
- in certain circumstances, the right to require us to erase personal data held by us about you;
- in certain circumstances, the right to restrict our processing of personal data held by us about you;
- in certain circumstances, a right to receive personal data which you have provided to us in a structured, commonly used and machine readable format. You may also have the right to require us to transfer this personal data to another organisation, at your request;
- the right to object to our processing of personal data held by us about you (including for the purposes of sending marketing materials to you); and
- the right to withdraw your consent, where we are relying on it to use your personal data

You can exercise some of these rights by contacting the data controller of this platform.

Some rights you can exercise directly on the platform via your Personal Account page; My Submissions Page; Manage Consent page; and by checking certain boxes on the consent forms we use when collecting your personal information. These facilitate you keeping your personal details up to date and prevent certain types of processing.

With regard to communications, if at any point you wish to review or change your preferences, you can use the 'opt-out' or 'unsubscribe' mechanism or other means provided within the communications that you receive from us or by sending an email to info@civiq.eu. Note that you may still receive transactional communications from the data controller.

To inquire about or exercise other rights please email the data controller. CiviQ will action any instructions from the data controller with respect to your request.

Changes to this policy

We reserve the right to modify the Privacy Policy at any stage. If and when we make changes to our privacy policy, we'll share details of these changes on this page. Please continue to check this page to ensure that you are always aware of any changes.

Concerns or complaints

You can contact us regarding this Privacy Policy using the details set out above. Should you wish to make a complaint, you may also contact the Data Protection Commissioner's Office using the details set out on its website, which is currently: https://www.dataprotection.ie.