

**DÚN LAOGHAIRE-RATHDOWN  
COUNTY COUNCIL**



**PRIVACY STATEMENT**  
**Finance and Economic**  
**Development Department**

## Contents

<b>1.0</b>	<b>Introduction</b>	3
<b>2.0</b>	<b>Purpose of Privacy Statement</b>	3
<b>3.0</b>	<b>Definitions</b>	4
<b>4.0</b>	<b>Scope</b>	4
<b>5.0</b>	<b>Data Protection Policy</b>	5
<b>6.0</b>	<b>What Personal Data is Processed?</b>	5
<b>7.0</b>	<b>Why Personal Data is Processed</b>	11
<b>8.0</b>	<b>The Legal Basis for Processing Personal Data</b>	11
<b>9.0</b>	<b>How Personal Data is Obtained</b>	12
<b>10.0</b>	<b>How Personal Data is Processed</b>	12
<b>11.0</b>	<b>Sharing Personal Data with Third Parties</b>	13
<b>12.0</b>	<b>Records Retention Policy</b>	18
<b>13.0</b>	<b>Data Subject Rights</b>	18
<b>14.0</b>	<b>Further Information</b>	19
<b>15.0</b>	<b>Complaints to the Data Protection Commission</b>	19

## **1.0 Introduction**

The Role of the Finance and Economic Development Department is to provide excellent Financial and Risk Management Services which align with the Corporate Goals and Objectives as set out in the Themes of the Corporate Plan and to support and foster economic development in the County. The Department promotes Economic Development and Entrepreneurship, fosters business start-ups and develops existing micro and small businesses to drive job creation and to provide accessible high quality supports for business ideas. It also supports and promotes Tourism Development through a range of supports and initiatives.

This is achieved through the provision of the following services/functions:

- 1.1 Non-Principal Private Residence (NPPR)
- 1.2 Management of Outstanding Historical Waste Charges
- 1.3 Management of Outstanding Historical Domestic Water Charges
- 1.4 Commercial Rates
- 1.5 Property Entry Levy (PEL)
- 1.6 Business Improvement District Scheme (BIDS)
- 1.7 Remittance Off-setting
- 1.8 Insurance Management
- 1.9 Payroll
- 1.10 Accounts Payable
- 1.11 Finance Revenue
- 1.12 Local Enterprise Office
- 1.13 Economic Development
- 1.14 Tourism Development

## **2.0 Purpose of Privacy Statement**

The purpose of this privacy statement is to describe, in clear and concise terms, the personal data the Finance and Economic Development Department may collect about individuals, why it is needed, how it is used and how individuals may interact with the Finance and Economic Development Department in relation to their personal data. It also outlines the rights of individuals under data protection legislation in relation to the processing of their personal data.

Date: 23 March 2021

### 3.0 Definitions

For the purposes of this privacy statement the following definitions apply:

- 3.1 **Data Subject:** is an identified or identifiable living individual who is the subject of personal data
- 3.2 **Personal Data:** any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological genetic, mental, economic, cultural or social identity of that person.
- 3.3 **Special Categories of Personal Data:** is personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data processed for the purpose of uniquely identifying a natural person; data concerning health and data concerning a natural person's sex life or sexual orientation.
- 3.4 **Processing:** is widely defined under the GDPR and means performing any operation or set of operations on personal data, whether or not by automated means, including:
  - the collection, recording, organisation, structuring or storing of the data;
  - the adaptation or alteration of the data;
  - the retrieval, consultation or use of the data;
  - the disclosure of the data by their transmission, dissemination or otherwise making the data available;
  - the alignment or combination of the data; or
  - the restriction, erasure or destruction of the data
- 3.5 **Data concerning health:** means personal data relating to the physical or mental health of an individual, including the provision of health care services to the individual, that reveal information about the status of his or her health.

### 4.0 Scope

Date: 23 March 2021

This statement applies to all personal data processed by the Finance and Economic Development Department in physical or electronic format relating to the services/functions outlined in Section 1.0.

## **5.0 Data Protection Policy**

The Finance and Economic Development Department process significant amount of personal data in various formats on an on-going basis. Dún Laoghaire-Rathdown County Council is committed to ensuring that personal data processed by its Finance and Economic Development Department is:

- Obtained lawfully, fairly and in a transparent manner
- Obtained for a specified, explicit and legitimate purposes only
- Adequate, relevant and limited to what is necessary for the purpose for which it was obtained
- Recorded, stored accurately and securely and where necessary kept up to date
- Kept only for as long as is necessary for the purposes for which it was obtained
- Kept in a form which permits identification of the data subject
- Processed in a manner that ensures the appropriate security of the personal data including protection against unauthorised or unlawful processing.

Dún Laoghaire-Rathdown County Council Data Protection Policy goes into more detail as to how it intends meeting these commitments.

## **6.0 What Personal Data is Processed?**

Details of the personal data processed by each of the services/functions of the Finance and Economic Development Department are contained in the following tables:

<b>Table 6.1</b>	
<b>Service/Function</b>	<b>Personal Data processed</b>
<b>Non Principal Private Residence (NPPR)</b>	
Certificates of Exemption	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details (Telephone Number, Email Address)</li> </ul>
Certificates of Discharge	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details (Telephone Number, Email Address)</li> <li>• PPS Number</li> </ul>
Management & Collection of Arrears	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details (Telephone Number, Email Address)</li> <li>• PPS Number</li> <li>• Bank Account Details</li> </ul>
Establishment & Management of Non Principal Private Residence (NPPR) Hardship Agreements	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details (Telephone Number, Email Address)</li> <li>• PPS Number</li> <li>• Bank Account Details</li> </ul>

<b>Table 6.2</b>	
<b>Services/Function</b>	<b>Personal Data processed</b>

Date: 23 March 2021

<b>Management of Historical Domestic Waste Charges</b>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details (Telephone Number, Email Address)</li> <li>• PPS No.</li> <li>• Bank Account Details</li> </ul>
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<b>Table 6.3</b>	
<b>Services/Function</b>	<b>Personal Data processed</b>
<b>Management of Historical Domestic Water Charges</b>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details (Telephone Number, Email Address)</li> <li>• PPS No.</li> <li>• Bank Account Details</li> </ul>

<b>Table 6.4</b>	
<b>Services/Function</b>	<b>Personal Data processed</b>
<b>Commercial Rates</b> Management & Collection of Commercial Rates	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details (Telephone Number, Email Address)</li> <li>• Bank Account Details</li> <li>• Property Valuation Details</li> <li>• Rates Customer ID</li> </ul>

<b>Table 6.5</b>	
<b>Services/Function</b>	<b>Personal Data processed</b>
<b>Property Entry Levy (PEL)</b> (New Accounts & Collection of outstanding PEL amounts due)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details (Telephone Number, Email Address)</li> <li>• Bank Account Details</li> </ul>

	<ul style="list-style-type: none"> <li>• Property Valuation Details</li> <li>• Estate Agent Details</li> </ul>
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<b>Table 6.6</b>	
<b>Services/Function</b>	<b>Personal Data processed</b>
<b>Business Improvement District Schemes (BIDS)</b>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details (Telephone Number, Email Address)</li> <li>• Bank Account Details</li> </ul>

<b>Table 6.7</b>	
<b>Services/Function</b>	<b>Personal Data processed</b>
<b>Remittance Off-Setting</b>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details (Telephone Number, Email Address)</li> <li>• Bank Account Details</li> <li>• Rates Customer ID</li> <li>• Rent Account No.</li> </ul>

<b>Table 6.8</b>	
<b>Services/Function</b>	<b>Personal Data processed</b>
<b>Insurance Management</b>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details (Telephone Number, Email Address)</li> <li>• PPS No</li> <li>• Bank Account Details</li> <li>• Date of Birth</li> </ul>

<b>Table 6.9</b>	
<b>Services/Function</b>	<b>Personal Data processed</b>
<b>Payroll Operations for Council and also for Central Statistics Office &amp; Revenue Commissioners</b>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details (Telephone Number, Email Address)</li> <li>• Staff No.</li> </ul>



	<ul style="list-style-type: none"> <li>• Bank Account Details</li> <li>• PPS No.</li> <li>• Date of Birth</li> </ul>
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<b>Table 6.10</b>	
<b>Services/Function</b>	<b>Personal Data processed</b>
<p><b>Accounts Payable</b> Payment of invoices and bills for goods, services, grants and refunds</p>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details (Telephone Number, Email Address)</li> <li>• Bank Account Details</li> <li>• PPS No. and/or Vat No.</li> </ul>

<b>Table 6.11</b>	
<b>Services/Function</b>	<b>Personal Data processed</b>
<p><b>Finance Revenue (FMS)</b> Processing Receipts</p>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details (Telephone Number, Email Address)</li> <li>• Bank Account Details</li> <li>• Cheque Number &amp; Details</li> <li>• Staff Number</li> </ul>
<p>Credit Card applications for relevant staff members</p>	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact Details (Telephone Number, Email Address)</li> <li>• Mothers Maiden Name</li> <li>• Bank Account Details</li> </ul>

Bank Reconciliation	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details (Telephone Number, Email Address)</li> <li>• Bank Account Details</li> <li>• Vat Nos.</li> </ul>
Single Europe Payments Area and Same Day Money Transfer forms	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> </ul>
LUAS Levy Refunds to Transport Infrastructure Ireland	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> </ul>

<b>Table 6.12</b>	
<b>Services/Function</b>	<b>Personal Data processed</b>
<b>Local Enterprise Office</b>	
Evaluating and processing grants to business	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact details</li> <li>• Education and training details</li> <li>• Employment details</li> <li>• Social Welfare information</li> <li>• Financial information</li> </ul>
Delivering training programmes and mentoring	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact details</li> <li>• Financial details</li> </ul>
Student enterprise programmes	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact details</li> </ul>
County Enterprise Awards	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact details</li> <li>• Bank account details</li> </ul>

Ireland's Best Young Entrepreneur	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact details</li> <li>• Date of birth</li> <li>• Bank account details</li> </ul>
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<b>Table 6.13</b>	
<b>Services/Function</b>	<b>Personal Data processed</b>
<b>Economic Development</b> (Payment of grants and financial supports)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact details</li> <li>• Bank account details</li> </ul>

<b>Table 6.14</b>	
<b>Services/Function</b>	<b>Personal Data processed</b>
<b>Tourism Development Initiatives</b> (Payment of grants and financial supports)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact details</li> <li>• Bank account details</li> </ul>

## **7.0 Why Personal Data is Processed**

Personal data is processed by the Finance and Economic Development Department in order to deliver the services/functions outlined in section 1.0.

If the Finance and Economic Development Department proposes to process personal data for a purpose other than it was obtained it will, prior to such processing, provide the data subject with information on that purpose and any other relevant information.

## **8.0 The Legal Basis for Processing Personal Data**

The legal basis for processing personal data by the Finance and Economic Development Department is contained in the following legislation:

- Local Government Act 2001- Section 65 and 67

Date: 23 March 2021

- Planning and Development Act 2000 - Section 49
- Finance (Local Property Tax) Act 2012 - Section 20
- Prompt Payments Act 1997 - Section 4
- Taxes Consolidation Act 1997 - Section 530
- VAT Consolidation Act 2010 - Section 16
- Local Government (Business Improvement Districts) Act 1996 - Section 7 and 129
- Local Government (Business Improvement Districts) Act 2006 - Section 7
- Local Government (Financial Provisions)(No. 2), Act, 1983 - Section 2
- Waste Management Act, 1996 - Section 31
- Protection of the Environment Act, 2003 - Section 19
- Local Government (Sanitary Services) Act, 1962 - Section 7
- Local Government (Financial Provisions) (No. 2) Act, 1983 - Section 2
- Water Services Act 2007 - Section 27
- Local Government (Charges\_ Act, 2009 as amended by Section 19 Local Government (Household Charge) Act, 2011 - Sections 4 and 8
- Local Government Act, 1941 - Section 58
- Local Government (Financial Provisions) (No. 2) Act, 1983 - Section 7

## **9.0 How Personal Data is Obtained**

Personal data collected by the Finance and Economic Development Department is in the most part obtained directly from data subjects availing of the services/functions outlined at section 1.0. However in some instances personal data may also be collected from clients, their legal representatives, staff, Government Departments and customers.

## **10.0 How Personal Data is Processed**

The processing of personal data by staff within the Finance and Economic Development Department is carried out through the use of:

- Hard Copy office files
- Electronic files
- Databases (Customer Relationship Management, CORE, Agresso, NPPR Bureau Information System, Submit.com Grant System, Milestone 4 Financial Management System, Grant Management Information System Enterprise Ireland)
- Productivity Applications (Microsoft Office)
- Collaboration Applications (Microsoft Teams, Microsoft Outlook)

## 11.0 Sharing Personal Data with Third Parties

The sharing of personal data with third parties will only occur in circumstances that are permitted by law.

Details of the sharing of personal data by the Finance and Economic Development Department with third parties are contained in the following tables:

<b>Table 11.1</b>	
<b>Services/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
<b>Non Principal Private Residence (NPPR)</b>	
Certificates of Exemption	<ul style="list-style-type: none"> <li>External Audit/Local Government Audit Service - to ensure compliance with appropriate processes and procedures</li> </ul>
Certificates of Discharge	<ul style="list-style-type: none"> <li>NPPR Bureau</li> <li>External Audit /Local Government Audit - to ensure compliance with appropriate processes and procedures</li> </ul>
Management & Collection of Arrears	<ul style="list-style-type: none"> <li>NPPR Bureau</li> </ul>
Establishment & Management of Non-Principal Private Residence (NPPR) Hardship Agreements	<ul style="list-style-type: none"> <li>NPPR Bureau</li> </ul>

Date: 23 March 2021

<b>Table 11.2</b>	
<b>Services/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
<b>Management of Historical Waste Charges</b>	<ul style="list-style-type: none"> <li>External Audit/Local Government Audit - to ensure compliance with appropriate processes and procedures</li> </ul>

<b>Table 11.3</b>	
<b>Services/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
<b>Management of Historical Domestic Water Charges</b> (Historic Billing Information only following transfer of function to Irish Water)	<ul style="list-style-type: none"> <li>External Audit/Local Government Audit - to ensure compliance with appropriate processes and procedures</li> <li>Irish Water - to provide them with the necessary information when dealing with customer queries regarding outstanding water charges due to DLR</li> </ul>

<b>Table 11.4</b>	
<b>Services/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
<b>Commercial Rates</b> (Management and collection of Commercial Rates)	<ul style="list-style-type: none"> <li>Agents - acting on behalf of landlords</li> <li>External Audit/Local Government Audit - to ensure compliance with appropriate processes and procedures</li> </ul>

<b>Table 11.5</b>	
<b>Services/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
<b>Property Entry Levy (PEL)</b> (New Accounts & Collection of outstanding PEL)	<ul style="list-style-type: none"> <li>Agents acting - on behalf of landlords</li> <li>External Audit/Local Government Audit - to ensure compliance with appropriate processes and procedures.</li> </ul>

<b>Table 11.6</b>	
<b>Services/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
<b>Business Improvement District Scheme (BIDS )</b>	<ul style="list-style-type: none"> <li>Sandyford BID Company Limited - to allow them to deal directly with businesses in their Bid Area, the</li> </ul>

	<p>income for which and income is transferred to them from DLR</p> <ul style="list-style-type: none"> <li>External Audit/Local Government Audit - to ensure compliance with appropriate processes and procedures</li> </ul>
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**Table 11.7**

<b>Services/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
<b>Remittance Off-Setting</b>	<ul style="list-style-type: none"> <li>Legal representatives -on behalf of their clients Agents - acting on behalf of landlords</li> <li>External Audit/Local Government Audit - to ensure compliance with appropriate processes and procedures</li> </ul>

**Table 11.8**

<b>Services/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
<b>Insurance Management</b>	<ul style="list-style-type: none"> <li>Irish Public Bodies (IPB) – to facilitate processing of claims</li> <li>External Solicitors - to facilitate processing of claims</li> <li>Personal Injuries Assessment Board (PIAB) -</li> <li>Liability Assessors -</li> <li>External Audit/Local Government Audit - to ensure compliance with appropriate processes and procedures</li> </ul>

**Table 11.9**

<b>Services/Function</b>	<b>Third Parties with whom Personal data is Shared</b>
<b>Payroll Operations for Council and also for Central Statistics Office &amp; Revenue Commissioners</b>	<ul style="list-style-type: none"> <li>MyPay - to facilitate processing of Payroll Services</li> <li>Revenue Online Service - to ensure compliance with taxation requirements</li> </ul>

	<ul style="list-style-type: none"> <li>• Department of Employment Affairs and Social Protection - to allow benefit payments to be made</li> <li>• External Audit Local Government Audit - to ensure compliance with appropriate processes and procedures</li> <li>• Third Party Audit (Voluntary Deductions) - to ensure compliance with appropriate processes and procedures</li> </ul>
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**Table 11.10**

<b>Services/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
<b>Accounts Payable</b> (Payment of invoices and bills for goods, services, grants and refunds)	<ul style="list-style-type: none"> <li>• Banks - to facilitate processing of payments</li> <li>• Revenue Commissioners - to facilitate compliance with taxation obligations</li> <li>• External Audit/Local Government Audit - to ensure compliance with appropriate processes and procedures</li> </ul>

**Table 11.11**

<b>Services/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
<b>Finance Revenue (FMS)</b> Processing Receipts  Credit Card applications for relevant staff members  Bank Reconciliation	<ul style="list-style-type: none"> <li>• External Audit/Local Government Audit to ensure compliance with appropriate processes and procedures</li> <li>• Bank of Ireland</li> <li>• External Audit/Local Government Audit to ensure compliance with appropriate processes and procedures</li> <li>• External Audit/Local Government Audit to ensure compliance with appropriate processes and procedures</li> </ul>



Single Europe Payments Area & Same Day Money Transfers	<ul style="list-style-type: none"> <li>• External Audit/Local Government Audit</li> </ul>
LUAS Levy Refunds to Transport Infrastructure Ireland	<ul style="list-style-type: none"> <li>• Transport Infrastructure Ireland</li> <li>• External Audit/Local Government Audit</li> </ul>

<b>Table 11.12</b>	
<b>Services/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
<b>Local Enterprise Office</b>	
Evaluating and processing grants to business	<ul style="list-style-type: none"> <li>• External Evaluation and Approvals Committee to allow for evaluation of grants</li> <li>• Enterprise Ireland to facilitate processing grants</li> <li>• External Audit/Local Government Audit to ensure compliance with appropriate processes and procedures</li> </ul>
Delivering training programmes and mentoring	<ul style="list-style-type: none"> <li>• Externally engaged Business Advisors and Mentors to allow delivery of training and mentoring</li> <li>• Enterprise Ireland to allow delivery of training and mentoring</li> <li>• Externally engaged Trainers to allow delivery of training</li> <li>• Enterprise Ireland to allow delivery of training</li> </ul>
Student enterprise programmes	<ul style="list-style-type: none"> <li>• Judging panels to allow delivery of programmes</li> <li>• Enterprise Ireland to allow delivery of programmes</li> </ul>
County Enterprise Awards	<ul style="list-style-type: none"> <li>• Judging panels to allow delivery of programmes</li> <li>• Enterprise Ireland to allow delivery of programmes</li> </ul>
Ireland's Best Young Entrepreneur	<ul style="list-style-type: none"> <li>• Judging panels to allow delivery of programmes</li> <li>• Enterprise Ireland to allow delivery of programmes</li> </ul>

<b>Table 11.13</b>	
<b>Services/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
<b>Economic Development Initiatives</b>	

(Payment of grants and financial supports)	<ul style="list-style-type: none"> <li>External Audit/Local Government Audit - to ensure compliance with appropriate processes and procedures</li> </ul>
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<b>Table 11.14</b>	
<b>Services/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
<b>Tourism Development Initiatives</b> (Payment of grants and financial supports)	<ul style="list-style-type: none"> <li>External Audit/Local Government Audit - to ensure compliance with appropriate processes and procedures</li> </ul>

## **12.0 Records Retention Policy**

The Finance and Economic Development Department's practices in relation to the retention of personal data are guided by the Local Government Management Agency's LGMA National Retention Policy for Local Authority Records and any updates that are issued by the LGMA.

## **13.0 Data Subject Rights**

Data subjects have a range of rights under GDPR. These include the following:

- The right to be informed;
- The right of access;
- Right to rectification of inaccurate or incomplete data;
- The right to erasure (also known as the 'right to be forgotten') of personal data;
- The right to portability;
- The right to object to the processing of personal data;
- The right to restrict the processing of personal data;
- Rights in relation to automated decision making, including profiling.

Dún Laoghaire Rathdown County Council has developed a Data Protection Policy which provides more detailed information on the rights of a data subject and how to exercise them. The Council's Corporate Affairs Department deal with all requests in relation to the rights of a data subject. Their contact details are as follows:-

Data Protection Co-Ordinator,  
 Dún Laoghaire-Rathdown County Council  
 Marine Road

Date: 23 March 2021

Dún Laoghaire  
County Dublin  
Tel.: 01 2054700  
E-mail: [dataprotection@dlrcoco.ie](mailto:dataprotection@dlrcoco.ie)

#### **14.0 Further Information**

Further information and advice on the operation of this privacy statement is available from the Data Protection Officer, Dún Laoghaire-Rathdown County Council. Contact details for the County Council's Data Protection Officer are as follows:

Data Protection Officer,  
Dún Laoghaire-Rathdown County Council  
Marine Road  
Dún Laoghaire  
County Dublin  
Tel.: 01 2054700  
E-mail: [dataprotectionofficer@dlrcoco.ie](mailto:dataprotectionofficer@dlrcoco.ie)

#### **15.0 Complaints to the Data Protection Commission**

If a Data subject is not satisfied with any aspect of this statement they may make a complaint to the Council's Data Protection Officer. The contact details for the Data Protection Officer are outlined at 14.0 above. However, a data subject may also make a complaint to the Data Protection Commission in following circumstances:

- a) If they experience a delay outside of the prescribed timeframe for making a decision on a data subject right request;
- b) If they are dissatisfied with a decision by Dún Laoghaire-Rathdown County Council on their data subject right request;
- c) If they consider that Dún Laoghaire-Rathdown County Council's processing of their personal data is contrary to data protection legislation.

The Contact details for the Data Protection Commission are as follows:

Data Protection Commission,  
21 Fitzwilliam Square South  
Dublin 2

Date: 23 March 2021

D02 RD28

Tel.: +353 578 648 800 or +353 761 104 800

E-mail: [info@dataprotection.ie](mailto:info@dataprotection.ie)

Website: [www.dataprotection.ie](http://www.dataprotection.ie)

March 2021

Date: 23 March 2021