



Data Protection Policy

Reviewed – Annually

This privacy notice explains the information used by Emerald Cultural Institute and our website is : www.eci.ie

Introduction

Emerald Cultural Institute is committed to protecting the privacy and security of personal data. This policy outlines our approach to GDPR compliance. It outlines how we safeguard personal data for students, staff and other stakeholders. Our aim is to ensure transparency and security while supporting the personal and professional growth we espouse in our mission statement. This policy reflects our mission to prioritise people in everything we do, fostering trust through robust data protection measures.

Responsibility

All employees share the responsibility of adhering to GDPR principles in their daily roles. David Ferguson acts as the Data Protection Officer (DPO), ensuring compliance, addressing concerns, and serving as the contact in this area.

Scope

This policy applies to all personal data processed by the school, and includes the following (this list is not inclusive):

- Students, guardians, and host families
- Teachers, employees, contractors, and job applicants
- Partners, agents, suppliers, and associated entities

Data types include names, dates of birth, passport numbers, contact details, attendance records, employment information, health and safety data, and anything else which may be considered private or provide information identifiable to an individual.

Implementation and Review

Who we are and what we do

We are an English Language College with offices in Palmerston Park, Rathgar, Dublin 6. This Privacy Notice is primarily directed to individuals who wish to or may wish to avail of our services in seeking academic studies, activities and who wish to be placed in student accommodation or for those who wish to or are providing services as a host family. If you wish to contact us on any issue regarding your data protection, the following are the contact options.

Post: GDPR Representative, Emerald Cultural Institute, Palmerston Park, Rathgar, Dublin 6

Phone: GDPR Representative at Palmerston Park, Rathgar
(01)4973361 Email: info@eci.ie

This Privacy Statement sets out how Emerald Cultural Institute uses and processes any information that you give to us. We respect your privacy and are committed to protecting your personal information. This Privacy Statement explains how we collect, transfer, process, use and disclose your data and sets out our security practices.

This privacy notice applies solely to information gathered by Emerald Cultural Institute. It outlines:

- The personally identifiable information collected through our forms, communications, and website.
- Your available options regarding the use of your data.
- The security measures implemented to prevent the misuse of your information.
- How you can correct any inaccuracies in your data.
- Details on information collection, usage, and sharing.

Who holds exclusive ownership of the information collected on the website

ECI only collects information that you voluntarily provide through email, our online forms, or other direct communication. Your information will never be sold or rented to anyone. We use it solely to respond to your inquiries and address the purpose of your contact. We do not share your information with third parties outside our organization, except as required to fulfil your request.

You have the right to opt out of future communications from us at any time.

To do so, you can contact us at info@eci.ie:

- Request access to the data we have about you.
- Update or correct any of your information.
- Request the deletion of your data.
- Raise any concerns regarding how we use your information.

Security

We prioritize the security of your information and take necessary precautions to protect it. When you submit sensitive information through our website, it is safeguarded both online and offline.

In addition to securing data transmitted online, we also protect your information offline. Access to personally identifiable information is restricted to employees who require it to perform specific job functions. Furthermore, all computers and files storing this information are maintained in a secure environment.

If you believe we are not adhering to this privacy policy, please contact us immediately at info@eci.ie

What data do we collect, and how do we use it?

- When an English course is booked, certain information is required to be collected.
- Name, nationality, date of birth, contact details, and emergency medical contacts will be requested.
- If necessary, passport or visa details, as well as specific medical and dietary information related to accommodation or study needs, may also be required.
- During school activities, photographs of students may be taken and used on official social media pages and marketing materials.
- By enrolling in a course, authorisation is given for these recordings to be used solely for educational purposes.
- All personal information will be securely stored and used only for the following purposes:
 - ✓ Enrolment in the school
 - ✓ Processing of transactions
 - ✓ Assistance with visa applications
 - ✓ Arrangement of accommodation

- ✓ Official promotion of Emerald Cultural Institute
- ✓ Creation of student or teacher portfolios
- ✓ Facilitation of teacher self-reflection

Host Families

- To consider your application to become a host family
- To consider students' suitability for placement in your accommodation
- To contact you regarding your accommodation services or in emergency situations
- To respond to your requests
- Seek your views on our services
- Improve our level of service
- Send you Marketing Updates regarding host family vacancies that might be of interest
- Share your information with prospective student/student ETO to increase your chances of securing a suitable student to stay at your accommodation

Permission is required by Emerald Cultural Institute to use this information, or any photographs taken. This data may be requested at any time, and a request for its removal from school records can be made, unless it is retained for legal reasons. In the case of minors, a minor consent form is signed.

We will ask you if you accept this privacy policy on our booking form. This can be withdrawn at any time.

If you have any questions, please contact us:
Emerald Cultural Institute

10 Palmerston Park, Rathgar, Dublin 06

+353 1 497 3361

info@eci.ie

Data protection statement

Any information collected from you may be used for the following purposes:

- To personalise your experience by allowing us to better respond to your individual needs.
- To enhance our school's offerings, as we continuously improve our language programmes based on the feedback and information received from you.
- For educational purposes, including the creation of student or teacher portfolios and teacher self-reflection.
- To process financial transactions.
- Your information, whether public or private, will not be sold, exchanged, transferred, or shared with any other company for any reason without your consent, except for the explicit purpose of enrolling you in one of our language programs, personalizing your experience (course, social program, accommodation), or officially promoting Emerald Cultural Institute.
- To maintain and administer health and safety records.
- To respond to email inquiries.
- To ensure appropriate action can be taken in emergency situations.

Your personal data – what is it?

- Personal data refers to information that can be used to identify an individual.
- Identification may occur based on data managed by Emerald Cultural Institute.
- The processing of personal data is regulated by the General Data Protection Regulation (GDPR).

Emerald Cultural Institute may collect and store the following information:

- Date of birth
- Contact details
- Nationality
- Gender
- Emergency phone number
- Payment information
- Passport and visa details (if required)

- Medical conditions, special educational needs, allergies, and any stated requirements
- Test and examination results
- Recordings from virtual classes
- School photographs and videos

Who are we?

Emerald Cultural Institute is the data controller, meaning that Emerald Cultural Institute determines how and why your personal data is collected, used, and retained.

How is your personal data processed?

Emerald Cultural Institute (ECI) adheres to the General Data Protection Regulation (GDPR) by:

- Keeping personal data accurate and up to date.
- Storing and disposing of data securely.
- Limiting data collection and retention to only what is necessary.
- Protecting personal data from loss, misuse, unauthorized access, and disclosure.
- Implementing appropriate technical measures to safeguard personal data.

Use and Sharing of Personal Data

Your personal data is used and shared for the following purposes:

- Providing our booking team with relevant information to successfully enroll students in language programs and accommodation options.
- Assisting our academic team and teachers in placing students in the appropriate class level.
- Processing financial transactions and managing school operations.
- Maintaining records for students, employees, agents, and host families.
- Managing health and safety records.
- Keeping financial accounts and academic records.
- Meeting accreditation requirements.
- Assisting non-EEA students with student visa applications in Ireland.

- Supporting students in opening Irish bank accounts, if applicable.
- Arranging medical insurance when requested or required.
- Keeping attendance records for immigration services.
- Immigration visa permissions for non-EU students with the Department of Justice / Irish Naturalisation and Immigration Office [INIS].
- Promoting the school and communicating with students about events and updates.
- Creating student or teacher portfolios and supporting teacher self-reflection.
- Enrolling students in English language examinations.

What is the legal basis for processing your data

These fall under either article 6 or article 9 – dealt with separately below:

Article 6 of GDPR – Lawfulness of Processing

- With the consent of the data subject
- Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract (see terms and conditions)
- Processing is necessary for compliance with a legal obligation (financial records are kept to meet our legal tax obligations, student records are kept for our accreditation requirements and immigration authorities)
- Processing is necessary to protect the vital interests of the data subject or another person (health and safety obligations)
- Processing is necessary for the legitimate interests of the data controller except where such interests are overridden by the interests, rights or freedoms of the data subject (to promote the language school and communicate information to students)

Article 9 of GDPR – Processing of special categories of Personal data

- Explicit consent of the data subject
- Processing is necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity (visa applications and visa requirements for non-EU students)

- Processing is necessary for reasons of substantial public interest on the basis of EU or Member State law (health and safety records, visa applications and visa requirements for non-EU students)
- Processing is necessary for the smooth operation of any student insurance policies
- Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes (enrolment information)

Sharing Your Personal Data

Personal data will be handled with the utmost confidentiality and will only be shared with relevant Emerald Cultural Institute staff as necessary to fulfil legal obligations. Where applicable, it may also be shared with trusted partner organisations that provide essential services, such as social program activities, medical care, insurance coverage, visa application support, bank account assistance, or immigration services. Your data will only be shared with third parties with your explicit consent.

Retention of Your Personal Data

Your personal data is retained for as long as necessary to fulfil our operational obligations. There is no predefined time limit for its storage unless you request its removal from our system.

Your Rights Regarding Your Personal Data

Under the General Data Protection Regulation (GDPR), unless an exemption applies, you have the following rights concerning your personal data:

- The right to request a copy of your personal data held by Emerald Cultural Institute
- The right to request corrections to any inaccurate or outdated personal data.
- The right to request the deletion of your personal data when it is no longer necessary for Emerald Cultural Institute to retain it.
- The right to withdraw your consent for data processing at any time.
- The right to request that your personal data be provided to you or, where possible, transferred directly to another data controller (right to data portability).
- The right to request a restriction on further processing of your data in cases where its accuracy or processing is disputed.
- The right to object to the processing of your personal data, unless it is required for legitimate or legal reasons.

- The right to file a complaint with the Data Protection Commissioner if you believe your data protection rights have been violated.

Transfer of data abroad

Your personal data may only be transferred to countries or territories outside the EU with your express consent if required.

Further Processing

If your personal data needs to be used for a purpose not covered by this Data Protection Notice, you will be provided with a new notice outlining the intended use before processing begins. This notice will detail the relevant purposes and processing conditions. Whenever necessary, your prior consent will be obtained before proceeding with the new processing.

Contact details

To exercise all relevant rights, queries of complaints please in the first instance contact David Ferguson (GDPR Officer) at:

Emerald Cultural Institute, 10 Palmerston Park, Rathgar, Dublin 6 , +353 1 497 3361
info@eci.ie

For details on the data collected when you visit and interact with our website (www.eci.ie) and how this information may be used, please refer to our Privacy and Cookie Policy.

Privacy Policy of www.eci.ie

This Website collects some Personal Data from its Users.

Owner and Data Controller

David Ferguson (GDPR Officer) reporting to Mauro Biondi (Managing Director)

Emerald Cultural Institute, 10 Palmerston Park, Rathgar, Dublin 06

Owner contact email: info@eci.ie

Types of Data Collected

This website collects various types of Personal Data, either directly or through third parties. These may include:

- Cookies
- First name and last name
- Country
- Email address
- Usage data
- Unique device identifiers for advertising (e.g., Google Advertiser ID or IDFA)
- Phone number

Complete details on the types of Personal Data collected are outlined in specific sections of this Privacy Policy or in explanatory texts displayed before data collection.

Personal Data may be voluntarily provided by users or, in the case of Usage Data, automatically collected when using the website.

Unless otherwise specified, all requested Personal Data is required for the website to provide its services. Failure to provide this data may result in the inability to access certain services. However, when the website explicitly states that certain data is optional, users may choose not to provide it without impacting the website's availability or functionality.

Service

Users unsure about which Personal Data is mandatory are encouraged to contact the Owner for clarification.

The use of Cookies or other tracking technologies by this website, or by third-party service providers associated with it, is intended to facilitate the requested services, as well as for additional purposes outlined in this document and, if applicable, in the Cookie Policy.

Users are solely responsible for any third-party Personal Data they obtain, publish, or share through this website. By doing so, they confirm that they have obtained the necessary consent from the third party to provide this data to the Owner.

How Your Data is Handled

The Owner takes strong security measures to protect your personal data from unauthorized access, sharing, modification, or deletion.

Your data is processed using computers and secure IT systems, following strict procedures to ensure it is used only for the intended purposes. In some cases, authorized personnel from the website's administration, sales, marketing, legal, or IT teams may have access to your data. Additionally, trusted external service providers (such as IT companies, hosting providers, communication agencies, or mail carriers) may handle

data on behalf of the Owner. These external providers are carefully selected and, if necessary, appointed as Data Processors. You can request an updated list of these providers from the Owner at any time.

Why Your Data is Processed (Legal Basis)

The Owner processes personal data for the following reasons:

- You have given consent for a specific purpose. (*In some countries, data may be processed until you opt out, unless European data protection laws apply.*)
- It is necessary to fulfill a contract with you or handle pre-contractual obligations.
- It is required by law that the Owner must follow.
- It serves a public interest or is part of an official responsibility assigned to the Owner.
- It supports a legitimate business need for the Owner or a third party.

If you have any concerns about how your data is used, you have the right to request further information or take action as outlined in the Privacy Policy.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Location of Data Processing

Personal data is processed at the Owner's main offices and at any other locations where the involved parties handle data processing.

Depending on the User's location, data may be transferred to a country different from their own. For more details about where transferred data is processed, Users can refer to the section outlining Personal Data processing.

Additionally, Users have the right to understand the legal basis for transferring data outside the European Union (EU) or to an international organization governed by public international law (such as the United Nations (UN)) or established by multiple countries. The Owner ensures that appropriate security measures are in place to protect such data transfers.

If a data transfer occurs, Users can find more information by reviewing the relevant sections of this document or by contacting the Owner using the details provided in the Contact section.

Data Retention Period

Personal data is processed and stored only for as long as necessary to fulfil the purposes for which it was collected.

- For contract-related purposes: Personal data collected to fulfil a contract between the Owner and the User will be retained until the contract has been fully executed.
- For legitimate business interests: Personal data collected to serve the Owner's legitimate interests will be retained for as long as necessary to achieve those purposes. Users can find more details on these interests in the relevant sections of this document or by contacting the Owner.

If the User has provided consent for data processing, the data may be retained for an extended period until consent is withdrawn. Additionally, the Owner may be legally required to keep personal data for a longer duration to comply with legal obligations or official orders.

Once the retention period ends, the personal data will be permanently deleted. As a result, after this period, the rights to access, erase, rectify, or transfer data can no longer be exercised.

Data Retention period in years

1. Student Records

- Attendance Records: Minimum 5 years (for compliance with visa and QQI regulations).
- Enrolment and Academic Records: Typically, 7 years, though best practice suggests keeping key records anonymised permanently if possible.
- Student Visa and Immigration Documents: At least 5 years after the student leaves the institution.

2. Financial and Tax Records

- Payroll and Employee Records: 6 years (Revenue Commissioners requirement).
- Invoices, Receipts, and Accounting Records: 6 years (Companies Act and Revenue Commissioners).
- Bank Statements and Financial Reports: 6 years.

3. Employment and HR Records

- Employee Contracts and Personnel Files: 7 years after employment ends.
- Work Permits and Visas: At least 5 years after expiry.
- Health and Safety Records: 10 years, but some records (like accident reports) may be kept for up to 20 years.

4. GDPR and Data Protection

- Personal Data (Students and Employees): Kept only for as long as necessary. If no legal requirement applies, a school should define its own retention policy, typically 5–7 years after the last contact.

Purposes of Data Processing

The User's data is collected to enable the Owner to provide its services and for the following purposes:

- Traffic optimisation and distribution
- User communication
- Analytics
- Advertising
- Remarketing and behavioural targeting
- Interaction with external social networks and platforms
- Displaying content from external platforms
- SPAM protection
- User database management
- Managing contacts and sending messages
- Interaction with live chat platforms
- Interaction with online survey platforms
- Platform services and hosting
- Registration and authentication

Detailed Information on Personal Data Processing

Personal data is collected for the purposes mentioned above and handled using the services described in this document.

[Privacy Policy of www.eci.ie](http://www.eci.ie)

This website collects certain Personal Data from its users.

This document can be printed for reference by using the print command in the settings of any browser.

Procedure for Identifying and Responding to Data Breaches

Data Breach Identification and Response Procedure

Emerald Cultural Institute maintains a clear and structured procedure for identifying, assessing, and responding to any suspected or confirmed personal data breach. A data breach is defined as any security incident that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

1. Identification of a Potential Breach

All employees, contractors, or third-party processors must immediately report any suspected data breach to the Data Protection Officer (DPO). Examples include:

- Unauthorised access to systems or files
- Loss or theft of devices, USBs, or documents
- Accidental sharing of personal data with the wrong recipient
- System failures that compromise data availability
- Cyberattacks, phishing incidents, or malware infections
-

2. Containment and Initial Assessment

- Upon receiving a report, the DPO will:
- Immediately assess the nature and scope of the breach
- Secure systems and prevent further data loss
- Work with IT or relevant staff to isolate affected devices or accounts
- Document all actions taken

3. Risk Evaluation

The DPO will evaluate:

- The categories and volume of data involved
- Whether sensitive/special category data is affected
- Potential harm to affected individuals
- The likelihood of identity theft, fraud, or reputational damage
- The impact on the Institute's operations

4. Notification Requirements

If the breach presents any risk to the rights and freedoms of individuals, the Institute will notify:

- The Data Protection Commission (DPC) within 72 hours
- Affected individuals without undue delay where high risk is identified

5. Remediation and Follow-Up

The Institute will:

- Take steps to recover compromised data where possible
- Update technical or organisational measures
- Provide staff training if human error contributed
- Keep a full incident report in the Data Breach Register

6. Data Breach Register

All breaches—whether notifiable or not—will be logged, including:

- Date and nature of the breach
- Individuals affected
- Containment measures
- Lessons learned and corrective actions

2. Identifying, Reporting & Responding to Data Breaches & Policy Change Communication

Data Breach Reporting Responsibilities

All staff must report suspected breaches **immediately** to the DPO via:

- Email: info@eci.ie
- Phone: +353 1 497 3361
- Direct escalation to line managers if the DPO is unavailable

Failure to report a breach may be considered a disciplinary matter.

Internal Communication Pathway

Once a breach is confirmed, the DPO will notify:

- Senior management
- Relevant department heads
- Any external partners (if involved)

If students, staff, or host families must be notified, the DPO will coordinate appropriate communication in writing.

Policy Change Communication

Changes to this policy will be communicated through:

- Staff meetings and internal briefings
- Updated documentation shared by email
- Revised versions uploaded to the internal system
- Where applicable, updates communicated to host families, partners, and third-party processors

A version-control log will be maintained noting:

- Date of changes
- Summary of amendments
- Reason for update
- Responsible reviewer

3. Data Breach Notification, Processor Obligations, Reviews, Audits & Data Return/Deletion

Notification of Data Breaches

Third-party processors must notify Emerald Cultural Institute **without undue delay**—and no later than 24 hours—after becoming aware of a personal data breach.

Notifications must include:

- Nature of the breach
- Categories of data and individuals affected
- Likely consequences
- Measures taken or proposed to address the breach

Third-Party Data Protection Obligations

All processors engaged by the Institute must:

- Process personal data solely on written instructions from Emerald Cultural Institute
- Implement appropriate technical and organisational security measures
- Ensure staff confidentiality

- Assist the Institute in responding to data access requests
- Assist in data breach detection, reporting and investigation
- Delete or return all personal data upon termination of services
- Make available all information needed for audits and inspections

These obligations must be included in all supplier or service contracts.

Regular Review of Processing Agreements

The Institute will review all data-processing agreements **annually** or when circumstances change, ensuring:

- Continued GDPR compliance
- Appropriate security standards
- Clear lawful bases for processing
- Updated international transfer safeguards (if applicable)

Audit and Inspection

The Institute reserves the right to carry out:

- Annual compliance audits
- Ad-hoc inspections where risks are identified
- Desk-based or on-site reviews of technical and organisational measures

Processors must cooperate fully and promptly.

Return or Deletion of Data

Upon termination of services or upon request, processors must:

- Either *securely delete or return all personal data*
- Provide written confirmation of deletion
- Ensure no copies (including backups) remain unless legally required

The Institute follows the same practice when transferring or closing internal records.

Detailed Information on Personal Data Processing

Advertising

This service allows User Data to be used for advertising purposes, displaying banners and other advertisements on this website, potentially based on User interests.

Not all Personal Data is used for advertising, and the conditions of use are specified below. Some services may use trackers to identify users, enable behavioral retargeting (showing ads based on user interests and past activity), or measure ad performance. For further details, please refer to the privacy policies of the respective services.

Most of these services provide an opt-out option. In addition to the opt-out features within each service, users can learn how to disable interest-based advertising in the "How to opt-out of interest-based advertising" section of this document.

Advertising Services Used on This Website

Meta Ads Conversion Tracking (Meta Pixel) – Facebook, Inc.

Meta Ads Conversion Tracking (Meta Pixel) is an analytics service provided by Meta Platforms, Inc. (or Meta Platforms Ireland Limited, depending on data processing location). It links data from the Meta Audience Network with user actions on this website. The Meta Pixel tracks ad conversions from Facebook, Instagram, and Meta Audience Network.

- Personal Data Processed: Trackers, Usage Data

Facebook Audience Network – Facebook, Inc.

Facebook Audience Network is an advertising service provided by Facebook, Inc. This website may use mobile device identifiers (such as Android Advertising ID or Advertising Identifier for iOS) and cookie-like technologies to run this service.

One way Audience Network displays ads is by utilizing the user's Facebook ad preferences. Users can control these preferences in Facebook ad settings.

Users may opt out of Audience Network targeting through:

- Device settings (e.g., advertising settings on mobile phones)
- Facebook ad settings
- Other opt-out options provided in this privacy policy
- Personal Data Processed: Cookies, Unique device identifiers (e.g., Google Advertiser ID or IDFA), Usage Data

Google Ads Conversion Tracking – Google LLC

Google Ads Conversion Tracking is an analytics service provided by Google LLC (or Google Ireland Limited, depending on the data processing location). It connects data from the Google Ads network with actions performed on this website.

- Personal Data Processed: Trackers, Usage Data

Analytics

This section includes services that allow the Owner to monitor and analyze web traffic while tracking user behavior.

Facebook Analytics for Apps (Facebook, Inc.)

Facebook Analytics for Apps is a service provided by Facebook, Inc. that helps analyze app usage.

- Personal Data Processed: Usage Data and various types of Data as outlined in the service's privacy policy.

Google Analytics (Universal Analytics)

Google Analytics (Universal Analytics) is a web analytics service offered by Google LLC or Google Ireland Limited, depending on how the Owner manages Data processing. This service collects and analyzes website usage data, generating reports and sharing insights with other Google services.

Google may use the collected data to customize and personalize ads within its advertising network.

- To learn more about how Google processes data, refer to their [Google's partner policy](#)
- Personal Data Processed: Cookies and Usage Data.
- Place of Processing: United States – [Privacy Policy – Opt Out](#) Ireland – [Privacy Policy](#).

WordPress Stats (Automattic Inc.)

WordPress Stats is an analytics service provided by Automattic Inc. that helps track website traffic and user engagement.

- Personal Data Processed: Cookies and Usage Data.
- Place of Processing: United States – [Privacy Policy](#).

Google Analytics Advertising Reporting Features (Google LLC)

Google Analytics on this website includes Advertising Reporting Features, which gather additional data from the DoubleClick cookie (for web activity) and device advertising IDs (for app activity). These features enable the Owner to analyse user behaviour, interests, and demographic data (age and gender, if enabled).

Users can opt out of Google's use of cookies via [Ads Settings](#).

For more details on Google's data usage, refer to their [partner policy](#) and [Business Data page](#).

- Personal Data Processed: Trackers, unique device identifiers for advertising (e.g., Google Advertiser ID or IDFA), and other data specified in the privacy policy.
- Place of Processing: United States – [Privacy Policy](#) – [Opt Out](#).

User Interaction Tracking

This section outlines services that allow the Owner to monitor web traffic and analyze user behavior.

Facebook Analytics for Apps (Facebook, Inc.)

Facebook Analytics for Apps is an analytics service provided by Facebook, Inc.

- Personal Data Processed: Usage Data and other types of Data as specified in the service's privacy policy.
- Data Processing Location: United States – [Privacy Policy](#).

Google Analytics (Universal Analytics)

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC or Google Ireland Limited, depending on the Owner's data processing arrangements. Google collects and analyzes website usage data, generating reports and integrating findings with other Google services. The collected data may also be used for personalized advertising within Google's ad network.

For more details on Google's data usage, refer to [Google's partner policy](#)

- Personal Data Processed: Cookies and Usage Data.
- Data Processing Location: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#)
- WordPress Stats (Automattic Inc.)

WordPress Stats is an analytics service provided by Automattic Inc.

- Personal Data Processed: Cookies and Usage Data.
- Data Processing Location: United States – [Privacy Policy](#).

Google Analytics Advertising Reporting Features (Google LLC)

Google Analytics on this website includes Advertising Reporting Features, which collect additional data from the DoubleClick cookie (web activity) and device advertising IDs (app activity). These features allow the Owner to analyze user behavior, interests, and demographic information such as age and gender (if enabled).

Users can opt out of Google's cookies by adjusting their [Ads Settings](#).

For further details, refer to [Google's Partner Policy](#)

- Personal Data Processed: Trackers, unique device identifiers for advertising (e.g., Google Advertiser ID or IDFA), and other data specified in the service's privacy policy.

Displaying Content from External Platforms

This website integrates services that allow users to view and interact with content hosted on external platforms directly from its pages. Even if users do not engage with these services, they may still collect web traffic data from the pages where they are embedded.

Google Maps Widget

Google Maps, provided by Google Inc., enables this website to display interactive maps.

- Personal Data Collected: Cookies, Usage Data
- Processing Location: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#)

Instagram Widget

The Instagram widget, provided by Instagram, Inc., allows this website to showcase Instagram images.

- Personal Data Collected: Cookies, Usage Data
- Processing Location: United States – [Privacy Policy](#)

YouTube Video Widget

YouTube, a video hosting service by Google Inc., enables this website to embed video content.

- Personal Data Collected: Cookies, Usage Data
- Processing Location: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#)
- Font Awesome

Font Awesome, a typography visualization service by Fonticons, Inc., allows this website to incorporate custom fonts and icons.

- Personal Data Collected: Usage Data

Google Fonts

Google Fonts, provided by Google Ireland Limited, enables the use of customized fonts on this website.

- Personal Data Collected: Usage Data, other data as specified in the [Privacy Policy](#)

YouTube IFrame Player

The YouTube IFrame Player, provided by Google LLC, allows this website to embed and display YouTube videos.

Through this service, the website may collect data directly or indirectly from users' devices, including through the use of trackers. Users can manage access to their data via Google's security settings page. Additional privacy information can be requested through the contact details provided in this document.

Additionally, data collected through this service may be used to help third parties deliver interest-based advertising. Users can opt out of this type of advertising via their device settings.

- Personal Data Collected: Device information, Trackers, Usage Data
- Processing Location: United States – [Privacy Policy](#)

Interaction with Data Collection Platforms and Third Parties

These services enable users to engage with data collection platforms or other external services directly through this website, allowing them to save and reuse data. Even if users do not actively interact with the service, it may still collect browsing and usage data from the pages where it is installed.

Direct Marketing via Popups (This Website)

This website utilizes popups to engage with users, offering services and products that may be provided by third parties or that are unrelated to the website's own offerings.

Personal Data Processed: Trackers and various types of data.

Interaction with External Social Networks and Platforms

These services enable direct interaction with social networks or other external platforms from this Website's pages.

The interactions and any information obtained through this Website are governed by the User's privacy settings on each social network. Even if Users do not actively engage with

these services, they may still collect traffic data from the pages where they are implemented.

To prevent any data processing from being linked to the User's profile, it is advisable to log out of the respective social networks before browsing this Website.

Facebook Like Button and Social Widgets (Facebook, Inc.)

This service enables interaction with the Facebook social network and is provided by Facebook, Inc.

- Personal Data Processed: Cookies, Usage Data
- Processing Location: United States – [Privacy Policy](#)

Twitter Tweet Button and Social Widgets (X Corp.)

This service allows interaction with the Twitter (now X) social network, provided by X Corp.

- Personal Data Processed: Cookies, Usage Data
- Processing Location: United States – [Privacy Policy](#)

YouTube Button and Social Widgets

The YouTube button and social widgets facilitate interaction with YouTube, a platform provided by Google Inc.

- Personal Data Processed: Usage Data
- Pinterest “Pin It” Button and Social Widgets (Pinterest Inc.)

This service enables interaction with the Pinterest platform, provided by Pinterest Inc.

- Personal Data Processed: Cookies, Usage Data
- Processing Location: United States – [Privacy Policy](#)

Google+ +1 Button and Social Widgets

The Google+ +1 button and social widgets allow interaction with the Google+ social network, provided by Google Inc.

- Personal Data Processed: Cookies, Usage Data
- Processing Location: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#)

Interaction with Live Chat Platforms

This service enables users to engage with third-party live chat platforms directly through the pages of this Website, allowing communication with the Website's support service. When one of these services is installed, it may gather browsing and usage data from the

pages where it's integrated, even if users don't actively engage with the service. Additionally, live chat conversations may be logged.

- **LiveChat Widget (LiveChat, Inc.)**
The LiveChat Widget facilitates interaction with the LiveChat platform provided by LiveChat, Inc.
Personal Data processed: Cookies, Usage Data.
- **Tawk.to Widget (tawk.to ltd.)**
The Tawk.to Widget enables interaction with the Tawk.to live chat platform provided by tawk.to ltd.
Personal Data processed: Cookies, Data shared during use, Usage Data.
- **WhatsApp Business Chat Widget (Meta Platforms Ireland Limited)**
The WhatsApp Business Chat widget allows interaction with the WhatsApp messaging app provided by Meta Platforms Ireland Limited.
Personal Data processed: Responses to questions, email or message content, Data shared during use, message date, first name, last name, phone number, profile picture, message sender, message timestamp, user content.

Interaction with Online Survey Platforms

This service enables users to engage with third-party online survey platforms directly from the pages of this Website.

If this service is activated, it may gather browsing and usage data on the pages where it is installed, even if users do not actively engage with it.

SurveyMonkey Widget (SurveyMonkey Inc.)

The SurveyMonkey Widget allows interaction with the SurveyMonkey online survey platform, offered by SurveyMonkey Inc.

Personal Data processed: Cookies; Usage Data.

Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

Mailchimp (The Rocket Science Group, LLC.)

Mailchimp is an email address management and message sending service provided by Intuit Inc.

Personal Data processed: email address.

Managing support and contact requests

This service enables the Website to handle support and contact requests received through email or other channels, such as a contact form. The Personal Data processed depends on the information provided by the User in the messages and the communication method used (e.g., email address).

WhatsApp Business customer support (Meta Platforms Ireland Limited)

WhatsApp Business customer support is a service provided by Meta Platforms Ireland Limited.

Personal Data processed: responses to inquiries; browsing history; email or message content; country; custom events; customer support data; data shared while using the service; point of sale information; message date; first name; location/region; language; phone number; user content.

Platform services and hosting

These services are designed to host and operate essential components of this Website, enabling it to be delivered from a unified platform. Such platforms offer a variety of tools to the Owner – such as analytics, user registration, commenting, database management, e-commerce, and payment processing – all of which involve the collection and management of Personal Data. Some of these services use geographically distributed servers, making it challenging to pinpoint the exact location where the Personal Data is stored.

WordPress.com (Automattic Inc.)

WordPress.com is a platform provided by Automattic Inc. that allows the Owner to create, operate, and host this Website.

Personal Data processed: various types of data as outlined in the service's privacy policy.

Registration and authentication

By registering or authenticating, users permit this Website to identify them and grant access to specific services.

As outlined below, third-party services may be used for registration and authentication. In such cases, this Website may access certain data stored by these third-party services for registration or identification purposes.

- WordPress.com Single Sign-On (Automattic Inc.)
WordPress.com Single Sign-On is a registration and authentication service offered by Automattic Inc., linked to the WordPress.com network.
Personal Data processed: various types of data as detailed in the service's privacy policy.

Remarketing and behavioural targeting

This service enables this Website and its partners to provide, optimize, and serve ads based on the User's previous interactions with the Website. This is achieved by tracking Usage Data and using Trackers to gather information, which is then shared with partners who handle remarketing and behavioral targeting activities. Some services also offer remarketing options using email address lists. In addition to any opt-out options provided by the services listed below, users can also opt out by visiting the Network Advertising Initiative opt-out page. Users may also disable certain advertising features through their device settings, such as the device advertising settings for mobile phones or the general ads settings.

Facebook Custom Audience (Facebook, Inc.)

Facebook Custom Audience is a remarketing and behavioral targeting service offered by Facebook, Inc. that links the activity of this Website with the Facebook advertising network.

Personal Data processed: Cookies; email address.

Facebook Remarketing (Facebook, Inc.)

Facebook Remarketing is a remarketing and behavioral targeting service provided by Facebook, Inc. that connects the activity of this Website with the Facebook advertising network.

Personal Data processed: Cookies; Usage Data.

Remarketing with Google Analytics Remarketing with Google Analytics is a remarketing and behavioral targeting service offered by Google LLC or Google Ireland Limited (depending on how the Owner manages Data processing), linking the tracking activity of Google Analytics and its Cookies with the Google Ads advertising network and the DoubleClick Cookie.

Personal Data processed: Cookies; Usage Data.

Google Ads Remarketing (Google Ireland Limited)

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google Ireland Limited, connecting the activity of this Website with the Google Ads advertising network and the DoubleClick Cookie.

Users can opt out of Google's use of cookies for ad personalization by visiting [Google's Ads Settings](#).

Personal Data processed: Cookies; Usage Data.

Google Ad Manager Audience Extension (Google LLC)

Google Ad Manager Audience Extension is a remarketing and behavioral targeting service offered by Google LLC that tracks visitors to this Website and enables selected advertising partners to show targeted ads across the web.

To learn more about Google's use of data, refer to Google's partner policy.

Personal Data processed: Trackers; Usage Data.

SPAM Protection

This service analyses the traffic of this Website, which may include Users' Personal Data, to filter out traffic, messages, and content that are identified as SPAM.

Google reCAPTCHA Google reCAPTCHA is a SPAM protection service offered by Google LLC or Google Ireland Limited, depending on how the Owner manages Data processing. The use of reCAPTCHA is governed by Google's privacy policy and terms of use. To understand how Google uses data, refer to Google's partner policy.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

- [Akismet](#) (Automattic Inc.)

Akismet is a SPAM protection service provided by Automattic Inc.

Personal Data processed: various types of data as specified in the service's privacy policy.

- [Wordfence Security Plugin](#) (Defiant, Inc.)

Wordfence Security Plugin is a security service for WordPress websites provided by Defiant, Inc.

Personal Data processed: coarse location; Trackers; Usage Data.

Tag Management

This service enables the Owner to manage the tags or scripts required for this Website in a centralized way.

As a result, Users' Data may flow through these services, which could lead to the retention of this Data.

Google Tag Manager

Google Tag Manager is a tag management service provided by Google LLC or Google Ireland Limited, depending on how the Owner manages Data processing.

Personal Data processed: Usage Data.

Traffic Optimization and Distribution

This service allows the Website to distribute content using servers located in various countries and to optimize its performance. The Personal Data processed depends on the characteristics and implementation of these services. Their purpose is to filter communications between this Website and the User's browser. Due to the widespread distribution of this system, it is challenging to determine the locations to which content containing the User's Personal Information may be transferred.

- [Cloudflare](#) (Cloudflare Inc.)

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc.

With Cloudflare's integration, it filters all traffic between this Website and the User's browser, while also enabling the collection of analytical data from this Website.

Personal Data processed: Cookies; various types of data as specified in the service's privacy policy.

Cookie Policy of Emerald Cultural Institute

About this Cookie Policy

This Cookie Policy explains what cookies are, how we use them & the types of cookies we use. Also, how to control your cookie preferences. You can at any time change or withdraw your cookie consent from the "Cookie Settings" tab on your screen. Learn

more about who we are, how you can contact us & how we process personal data in our Privacy Policy. Your consent applies to the following domain: eci.ie

Your current state: No consent given. Manage your consent.

What are cookies?

Cookies are small text files that are used to store small pieces of information. The cookies are stored on your device when the website is loaded on your browser.

These cookies help us make the website function properly, make the website more secure, provide a better user experience, understand how the website performs & to analyze what works & where it needs improvement.

How do we use cookies?

Similar to most online services, our website uses first-party & third-party cookies for a number of purposes. The first-party cookies are mostly necessary for the website to function correctly, they do not collect any of your personally identifiable data.

The third-party cookies used on our websites are used mainly for understanding how the website performs, how you interact with our website, keeping our services secure, providing advertisements that are relevant to you, providing you with an improved user experience & helping to speed up your future interactions with our website.

What types of cookies do we use?

The cookies used on our website are grouped into the following categories:

- **Necessary**

Necessary cookies are absolutely essential for the website to function properly. This category only includes cookies that ensures basic functionalities and security features of the website. These cookies do not store any personal information.

- **Analytics**

Analytical cookies are used to understand how visitors interact with the website. These cookies help provide information on metrics the number of visitors, bounce rate, traffic source, etc.

- **Marketing**

Marketing cookies are used to provide visitors with relevant ads and marketing campaigns. These cookies track visitors across websites and collect information to provide customized ads.

- **Uncategorised**

Undefined cookies are those that are being analyzed and have not been classified into a category as yet. More detail about the cookie's purpose is required from the publisher.

- **Functional**

Functional cookies help to perform certain functionalities like sharing the content of the website on social media platforms, collect feedbacks, and other third-party features.

The below list details the cookies used in our website:

Cookie	Description
Necessary	
cookielawinfo-checkbox-uncategorised	This cookie is set by the GDPR Cookie Consent plugin. The purpose of this cookie is to check whether or not the user has given consent to the usage of cookies under the category 'Uncategorised'.
cookielawinfo-checkbox-functional	This cookie is set by the GDPR Cookie Consent plugin. The purpose of this cookie is to check whether or not the user has given consent to the usage of cookies under the category 'Functional'.
cookielawinfo-checkbox-analytics	This cookie is set by GDPR Cookie Consent plugin. The purpose of this cookie is to check whether or not the user has given consent to the usage of cookies under the category 'Analytics'.

cookielawinfo-checkbox-performance	This cookie is set by GDPR Cookie Consent plugin. The purpose of this cookie is to check whether or not the user has given consent to the usage of cookies under the category 'Performance'.
cookielawinfo-checkbox-marketing	This cookie is set by the GDPR Cookie Consent plugin. The purpose of this cookie is to check whether or not the user has given consent to the usage of cookies under the category 'Marketing'.
csrftoken	This cookie is associated with Django web development platform for python. Used to help protect the website against Cross-Site Request Forgery attacks
_fbp	This cookie is set by Facebook to deliver advertisement when they are on Facebook or a digital platform powered by Facebook advertising after visiting this website.
fr	The cookie is set by Facebook to show relevant advertisements to the users and measure and improve the advertisements. The cookie also tracks the behavior of the user across the web on sites that have Facebook pixel or Facebook social plugin.
m	Determines the device used to access the website. This allows the website to be formatted accordingly.
__stripe_mid	Stripe is used to allow credit card payments. Stripe uses a cookie to remember who you are and to enable the website to process payments without storing any credit card information on its own servers. The main purpose of this cookie is: Functionality
__stripe_sid	Stripe is used to allow credit card payments. Stripe uses a cookie to remember who you are and to enable the website to process payments without storing any credit card information on its own servers. The main purpose of this cookie is: Functionality
viewed_cookie_policy	The cookie is set by the GDPR Cookie Consent plugin and is used to store whether or not user has consented to the use of cookies. It does not store any personal data.
cookielawinfo-checkbox-necessary	This cookie is set by GDPR Cookie Consent plugin. The cookies is used to store the user consent for the cookies in the category "Necessary".

cookielawinfo-checkbox-non-necessary	This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category "Non Necessary".
Analytics	
YSC	This cookie is set by YouTube and is used to track the views of embedded videos.
_gid	This cookie is installed by Google Analytics. The cookie is used to store information of how visitors use a website and helps in creating an analytics report of how the website is doing. The data collected including the number of visitors, the source where they have come from, and the pages visited in an anonymous form.
_gat_UA-28209741-1	This is a pattern type cookie set by Google Analytics, where the pattern element on the name contains the unique identity number of the account or website it relates to. It appears to be a variation of the _gat cookie which is used to limit the amount of data recorded by Google on high traffic volume websites.
GPS	This cookie is set by YouTube and registers a unique ID for tracking users based on their geographical location.
_ga	This cookie is installed by Google Analytics. The cookie is used to calculate visitor, session, campaign data and keep track of site usage for the site's analytics report. The cookies store information anonymously and assigns a randomly generated number to identify unique visitors.
Marketing	
IDE	Used by Google DoubleClick and stores information about how the user uses the website and any other advertisement before visiting the website. This is used to present users with ads that are relevant to them according to the user profile.
VISITOR_INFO1_LIVE	This cookie is set by YouTube. Used to track the information of the embedded YouTube videos on a website.
test_cookie	This cookie is set by doubleclick.net. The purpose of the cookie is to determine if the user's browser supports cookies.
Uncategorised	

all_RyEgsSBXVzZXJzGICA4J_DqeEIDA-cd_pubnub_visitor	Uncategorised. Publisher to be identified
all_RyEgsSBXVzZXJzGICA4J_DqeEIDA-site_visit_time	Uncategorised. Publisher to be identified
all_RyEgsSBXVzZXJzGICA4J_DqeEIDA-visit_count	Uncategorised. Publisher to be identified
Functional	
ig_nrcb	The cookie is set by Instagram. More detail to follow from the publisher.
ig_did	The cookie is set by Instagram. Is set as soon as an Instagram plugin is embedded in our website. Enables the correct functionality of these Instagram plugins, such as embedded Instagram posts. Instagram cookie information: help.instagram.com/1896641480634370
mid	The cookie is set by Instagram. The cookie is used to distinguish users and to show relevant content, for better user experience and security.

How can I control my cookie preferences?

You can manage your cookies preferences by clicking on the “Cookie Settings” tab & enabling or disabling the cookie categories on the pop-up according to your preferences.

Should you decide to change your preferences later through your browsing session, you can click on the “Cookie Settings” tab on your screen. This will display the consent notice again enabling you to change your preferences or withdraw your consent entirely.

In addition to this, different browsers provide different methods to block & delete cookies used by websites.

You can find out how to manage cookies on popular browsers by using the links below:

- [Google Chrome](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)
- [Microsoft Internet Explorer](#)
- [Opera](#)
- [Apple Safari](#)
- [Apple Safari Mobile](#)

To find information relating to other browsers, visit the browser developer's website.

To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

Owner and Data Controller

Mauro Biondi

Emerald Cultural Institute

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Rathgar,

Dublin 6

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Owner contact email: info@eci.ie

Since the use of third-party Trackers through this Website cannot be fully controlled by the Owner, any specific references to third-party Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by this Website.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of

pages visited, and other parameters about the device operating system and/or the User's IT environment.

- **User**
The individual using this Website who, unless otherwise specified, coincides with the Data Subject.
- **Data Subject**
The natural person to whom the Personal Data refers.
- **Data Processor (or Processor)**
The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.
- **Data Controller (or Owner)**
The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Website. The Data Controller, unless otherwise specified, is the Owner of this Website.
- **This Website (or this Application)**
The means by which the Personal Data of the User is collected and processed.
- **Service**
The service provided by this Website as described in the relative terms (if available) and on this site/application.
- **European Union (or EU)**
Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.
- **Cookie**
Cookies are Trackers consisting of small sets of data stored in the User's browser.
- **Tracker**
Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

David Ferguson (GDPR Officer) reporting to Mauro Biondi (Managing Director)

Emerald Cultural Institute, 10 Palmerston Park, Rathgar, Dublin 6

Owner contact email: info@eci.ie

Summary of Changes:

Updates		
Date	Summary of changes	Approved by
1 st December 2025	Procedure for Identifying and Responding to Data Breaches included	David Ferguson DPO
December 2024	Realigned to our new standard policy template (expanded to include purpose summary, scope, implementation and review SOP, summary of record keeping and appeals process).	David Ferguson DPO
May 2024	Reviewed by incoming DPO	David Ferguson DPO
2022	Policy updated	DPO Conor O'Grady
May 2018	Policy updated to reference updates in legislation	DPO Conor O'Grady and Senior Management Team