

THE EDUCATIONAL COMPANY OF IRELAND T/A EDKO
DATA PROTECTION NOTICE

1. PURPOSE AND SCOPE OF NOTICE

This notice is intended to explain how information about you will be handled by The Educational Company of Ireland t/a Edco ("**Edco**", "**we**", "**us**" and "**our**") and sets out the information including the personal information detailed below relating to you ("**Personal Data**") that will be collected and processed by Edco and/or on its behalf by its third party service providers in the context of your interactions and/or dealings with us.

For the purposes of this notice, the controller of your Personal Data is The Educational Company of Ireland t/a Edco of 12 Ballymount Road Lower, Walkinstown, Dublin 12. We are a member of the Smurfit Kappa Group but your Personal Data will be under the responsibility of Edco.

If you have any questions or concerns about this notice, you can contact us:

- **By e-mail:** dpr@edco.ie
- **By telephone:** (01) 4500 611
- **By post:** The Educational Company of Ireland, Ballymount Road, Walkinstown, Dublin 12.

2. APPLICATION OF THIS NOTICE

IMPORTANT: please note that this notice, while intended to be as complete and accurate as reasonably possible, is **not exhaustive** and may be updated from time to time in accordance with section 12 of this notice.

This notice is separated into a number of sections, some or all of which may be relevant to you depending on the nature of your relationship with Edco. In all cases, you have certain rights under data protection law which are set out in section 11 of this notice. In particular, you have a right to object at any time to the processing of your Personal Data where we process your Personal Data on the legal basis of pursuing our legitimate interests.

- **Teachers/Student Teachers & Schools:** if you have registered to use our online resource, **Edco Learning** and/or you have signed up to receive marketing communications from us, you can read about how we will use your Personal Data for this purpose at section 4.
- **Students:** if you are a student who uses our range of educational resources either online or offline you can read about how we process your Personal Data at section 5.
- **Booksellers:** if you are a bookseller who purchases our range of educational publications you can read about how we will use your Personal Data for this purpose at section 6.
- **Website Users:** if you use our websites, edco.ie, edcolearning.ie, revisewise.ie, e-xamit.ie and/or all of Edco's microsites (*.edco.ie) e.g. iontas1.edco.ie each a ("**Website**"), you can read about we use your Personal data as a website user at section 7. Website users should also read our Cookies Policy which is available here <https://edcolearning.ie/cookiepolicy>

3. WHAT PERSONAL DATA WE PROCESS

Depending on your interactions and/or dealings with us, we will process the following types of Personal Data about you:

- **If you are a teacher/student teacher or school**, your name, your personal contact details (where relevant), your school contact details and information relating to your subscription to, receipt of or interest in any of our mailing lists or newsletters.
- **If you are a student**: your name, your school details, and your email address. If you are a student who has registered to use our online resource, **Edco Learning**, and under the age of 16 we will also collect the email address of your parent or guardian.
- **If you are a bookseller**, your name, your contact details, your email address, and billing information.
- **If you use the Website**, information about your visits to our Website, your location and IP address, the browser software you use and the date and time you access the Website.

4. TEACHERS/STUDENT TEACHERS AND SCHOOLS

If you are a teacher/student teacher or school we may obtain, collect and process your Personal Data to sell you our products and/or provide our services to you. For example, we collect your Personal Data:

- To provide you with the school book publications you order;
- To fulfil contractual obligations and facilitate payment and deliveries; and
- To process and administer accounts and payments in relation to the services/products you request/use.
- To register you for our online resource, Edco Learning;
- To inform you about new or (pre-)ordered school book publications;

It is necessary for us to process your Personal Data for the above purposes; otherwise, we would not be able to sell our products or provide our services to you.

In other instances, we will obtain and process your Personal Data by relying on your consent or, where we are already in contact with you, on our legitimate interest to continue to contact you about products or related information which we think may be of interest to you. For example, we collect your Personal Data:

- To inform you about new and additional resources available on Edco Learning;
- To develop and maintain our relationship with you;
- To manage and administer our relationship with our network of educational professionals;
- To send you marketing material, newsletters and other related information;
- To monitor and analyse your interest in the material we send to you;
- To invite you to events

You will always have the opportunity to stop receiving marketing communications. With postal communications, you can opt out using the contact details in section 1. You can always opt out of email marketing from us by clicking the "*unsubscribe*" link at the bottom of marketing emails which we send you.

5. STUDENTS

If you are a student we may obtain, collect and process your Personal Data to sell you our products and/or provide our services to you. For example, we collect your Personal Data:

- To provide you with the school book publications you order;
- To inform you about new or (pre-)ordered school book publications;
- To fulfil contractual obligations and facilitate payment and deliveries; and
- To process and administer accounts and payments in relation to the services/products you request/use.
- To register you for our online resource, Edco Learning;

It is necessary for us to process your Personal Data for the above purposes; otherwise, we would not be able to sell our products or provide our services to you.

If you are a student we may obtain, collect and process your Personal Data by relying on our legitimate interest or your consent. For example, we collect your Personal Data:

- To review and respond to any correspondence or queries you send us;
- To register you for our online resource, Edco Learning;
- To ensure the operation of and the maintenance of your personal user account on Edco Learning;
- To monitor your use of our online resource, Edco Learning to understand what resources you use, avail of and/or find interesting or helpful; and
- To send you educational newsletters which you may sign up for.

[You can always opt out of e-mail newsletters from us by clicking the "*unsubscribe*" link at the bottom of marketing emails which we send you.]

IMPORTANT: Students Under 16 Using Edco Learning

If you are under 16 and using the online resource, Edco Learning, we will seek consent from your parent/guardian in order for you to use this resource. Edco does not knowingly permit students under the age of 16 ("Child User") to register directly for our newsletters or other services without consent of that Child User's parent or guardian. If Edco learns that Personal Data of a Child User have been collected without such consent then Edco will take appropriate steps to delete any and all Personal Data collected. If you are a parent or guardian of a Child User and discover that your child has registered for Edco Learning or our newsletters without your consent, please get in contact with Edco at [support@edcolearning.ie] and request that we delete the Child User's Personal Data from our systems.

If you are a bookseller who purchases or is interested in purchasing our range of publications we may obtain, collect and process your Personal Data to sell you such products and/or provide our services to you. For example, we collect your Personal Data:

- To fulfil contractual obligations (e.g. process your orders) and arrange for the delivery of your orders;
- To inform you about new or (pre-)ordered school book publications; and
- Out of Stock, Back in Stock, Recalled items; and
- To process and administer accounts and payments in relation to the services/products you have requested/use;

It is necessary for us to process your Personal Data for the above purposes; otherwise, we would not be able to sell our products or provide our services to you.

In other instances, we will obtain and process your Personal Data by relying on your consent or, where we are already in contact with you, on our legitimate interest to continue to contact you about products or related information which we think may be of interest to you. For example, we collect your Personal Data:

- To develop and maintain our relationship with you;
- To inform you about new and additional materials we publish;
- To manage and administer our relationship with our network of bookselling customers;
- To send you marketing material, newsletters and other information;
- To monitor and analyse your interest in the material we send to you;
- To invite you to events; and
- To send you marketing information by post provided you have not objected to this.

You will always have the opportunity to stop receiving marketing communications. With postal communications you can opt out using the contact details in section 11. [You can always opt out of email marketing from us by clicking the "*unsubscribe*" link at the bottom of marketing emails which we send you.]

6. WEBSITE AND EDCO LEARNING USERS

If you visit our Website and/or our online resource, Edco Learning, we may obtain, collect and process your Personal Data by relying on our legitimate interest. For example, we collect your Personal Data:

- To provide, improve, test and monitor the effectiveness of the Website and/or Edco Learning;
- To monitor metrics such as total number of visitors, traffic data and demographic patterns;
- To ensure content on the Website and/or Edco Learning is presented in the most effective manner for you and to enhance your use of the website; and
- To notify you of any changes to the Website and/or Edco Learning.

By using your Personal Data for these purposes, it helps us to keep the Website and/or Edco Learning available and to improve your experience when you visit the Website and/or Edco Learning.

7. DISCLOSURE OF YOUR PERSONAL DATA

Depending on your dealings with us, we may disclose some or all of the Personal Data we collect from and obtain about you to the following parties: service providers who provide support services, IT & website service providers, professional advisors such as tax or legal advisors, consultants and accountants, and third parties in connection with the sale or purchase of Edco or assets owned by Edco.

8. TRANSFERS OF YOUR PERSONAL DATA

We will transfer your Personal Data outside the European Economic Area ("**EEA**") to Eventbrite, our service provider located in the United States of America. As the European Commission has determined that the data protection laws of certain non-EEA countries, such as the United States, do not ensure an adequate level of protection for personal data collected from EU data subjects, the transfer of your Personal Data will be subject to appropriate safeguards. Transfers of your Personal Data to Eventbrite are subject to the EU-US Privacy Shield. You can find out more about the Standard Contractual Clauses [here](#) and EU-US Privacy Shield [here](#). If you would like to find out more about any such transfers, please contact us using the details set out in section 1 of this notice.

9. RETENTION OF YOUR PERSONAL DATA

In general, we expect to keep your Personal Data as long as your account is active and up to and including two years of account inactivity. Once we have determined that we no longer need to hold your Personal Data, we will delete it from our systems.

Please note that in certain circumstances, we may hold your data for a longer period, for example, if we are processing an ongoing claim or believe in good faith that the law or a relevant regulator may reasonably in our view expect or require us to preserve your Personal Data. If you would like to know more about how long we will retain your Personal Data, please contact us using the contact details set out in section 1 of this notice.

10. YOUR RIGHTS AND HOW TO EXERCISE THEM

You have a number of rights in relation to your Personal Data, which are set out in this section 11. **In particular these rights include the right to object to processing of your Personal Data where that processing is carried out for our legitimate interests.** Note that in certain circumstances these rights might not be absolute.

Right	Further Information
Right to Object	You have a right to object at any time to the processing of your Personal Data where we process your Personal Data on the legal basis of pursuing our legitimate interests. When we process your Personal Data based on our legitimate interests, we make sure to consider and balance any potential impact on you and your data protection rights. We will not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by Member State or European Union law).
Right of Access	You have the right to request a copy of the Personal Data held by us about you and to access the information which we hold about you. We will only charge you for making such an access request where we feel your request is unjustified or excessive.
Right to Rectification	You have the right to have any inaccurate Personal Data which we hold about you updated or corrected.
Right to Erasure	In certain circumstances, you may also have your personal information deleted, for example if you exercise your right to object (see below) and we do not have an overriding reason to process your Personal Data or if we no longer require your Personal Data for the purposes as set out in this notice.
Right to Restriction of Processing	You have the right to ask us to restrict processing your Personal Data in certain cases, including if you believe that the Personal Data we hold about you is inaccurate or our use of your information is unlawful. If you validly exercise this right, we will store your Personal Data and will not carry out any other processing until the issue is resolved.
Right to Data Portability	You may request us to provide you with your Personal Data which you have given us in a structured, commonly used and machine-readable format and you may request us to transmit your Personal Data directly to another data controller where this is technically feasible. This right only arises where: (1) we process your Personal Data with your consent or where it is necessary to perform our contract with you; and (2) the processing is carried out by automated means.

You can exercise any of these rights by submitting a request to our Data Protection Representative in writing, to dpr@edco.ie

We will provide you with information on any action taken upon your request in relation to any of these rights without undue delay and at the latest within 1 month of receiving your request. We may extend this up to 2 months if necessary however we will inform you if this arises. Please note that we may ask you to verify your identity when you seek to exercise any of your data protection rights.

You also have the right to lodge a complaint with the Data Protection Commission. For further information see www.dataprotection.ie.

11. CHANGES TO THIS NOTICE, REQUESTS & QUESTIONS

We may amend this notice on occasion, in whole or part, at our sole discretion. Any changes will be effective immediately and available here <https://edcolearning.ie/dpn>

If at any time we decide to use your Personal Data in a manner significantly different from that stated in this notice, or otherwise disclosed to you at the time it was collected, we will notify you by e-mail or post and you will have a choice as to whether or not we use your Personal Data in the new manner.

If you would like to submit a request or have any questions, comments or concerns about the way your Personal Data are being used or processed by Ecdco, please submit your request, question, comment or concern:

- **By e-mail:** dpr@edco.ie
- **By telephone:** (01) 4500 611
- **By post:** The Educational Company of Ireland, Ballymount Road, Walkinstown, Dublin 12.