

Your privacy is important to Quare Media Limited and maintaining your trust is paramount to us. We are fully committed to keeping your personal information safe. This privacy policy is intended to provide you with information about the personal information we collect and how that information is used and shared. We collect personal information about you when you access this website or when you use any of our products, applications or services (collectively our “Services”).

This document outlines our approach to compliance with the General Data Protection Regulation (GDPR) and all other relevant data-protection legislation. It also sets forth your privacy rights. Please take a moment to familiarise yourself with our privacy practices.

It’s important that you read this privacy policy together with any other privacy policy we may provide on specific occasions so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

We value your opinions. Should you have any questions or comments related to this privacy policy, please contact us at info@quaremedia.com.

Changes to this privacy policy

We may update this privacy policy from time to time. If we make any material changes, we will notify you prior to the changes taking effect by posting a notice on our websites and, where appropriate, sending you a notification.

Who we are and how to contact us

Throughout this privacy policy, “we” “us” and “ours” refers to Quare Media Limited. Quare Media Limited is a registered company with an address at 25 Herbert Street, Dublin 2, D02AY86 Ireland. We are the company that controls your data known as the “ data controller” under data protection law. Quare Media Limited Group means all fully consolidated subsidiaries under the management control of Quare Media Limited. We can be contacted by post or by email at info@quaremedia.com

Data protection contact

Our Customer Care team will be your initial point of contact for all data-protection inquiries. They can be reached by email at info@quaremedia.com

Information we collect and how we use it

We collect and use your personal information for a variety of reasons including:

If you register, purchase or subscribe to one of our Services

- **To create an account with us**

To become a subscriber to *Quare Media Limited* or to purchase or subscribe to one of our other Services, you will need to create an account with us.

- We will use your personal information to carry out our obligations arising from any contract you as our customer have entered into with us, including sending important notices such as communications relating to payment, delivery services, changes to our terms, conditions, and policies and to notify you about changes to our service. We may notify you by phone, post, email, SMS text or through other digital media depending on the content of the notification and your preferred contact mechanism.

We will also use your personal information to provide you **welcome emails** to help you get the most out of your subscription, **subscriber-only content** (e.g. specially selected articles and subscriber-only newsletters) and **subscriber rewards** which may include competitions, events and offers that are available

exclusively to our subscribers.

If you cancel your subscription with us, we may use your personal information for direct marketing. **We will only do so with your consent.** We will use your information for a reasonable period of time, not exceeding five months, after your relationship with us has ended. Specifically, we will send you a short series of emails to remind you of the benefits of a subscription with us. You have the right to unsubscribe from receiving such communications from us by following the unsubscribe instructions included at the end of each email communication.

- **To pay for the Services you have requested from us**

We will collect your payment information to pay for any Services you have requested from us. Credit and debit card information is processed directly by PCI-compliant payment providers who perform payment services on our behalf. Occasionally, our employees receive payment information from customers over the phone. When this occurs, the payment information is entered as instructed into the relevant payment system and all other copies are deleted or destroyed immediately.

To facilitate registration through social networks

We may collect your publicly available social media profile details including your name and email address when you sign up for one of our services through a social media account. We may use these details for the purposes of our registration process in order to enter into a contract with you. We may also automatically import your profile photo and membership status of Facebook, LinkedIn and Twitter if you choose to make these details public.

Where we do, we do so in pursuit of our legitimate interest in understanding the demographics of our customers and readers.

- **To sponsor content**

We may process your personal information if you opt to sponsor content. We only process this information to deliver the service you have requested as per the terms and conditions you accept.

To deliver marketing, promotions and to conduct research

- **To receive marketing communications**

We may periodically send promotional emails about features, events, exclusive offers and competitions to the email address you have provided – **we will only do so with your consent**. We have an interest in making sure our marketing is relevant for you, so we may process your information to send you marketing communications tailored to your interests. You may at any time choose not to receive marketing communications from us by following the unsubscribe instructions included at the end of each email communication.

- **For competition and promotional purposes**

We sometimes run competitions or similar promotions. If you choose to enter a competition or promotion, we will use your personal information to administer these promotions and as per the terms and conditions you accept when you enter. In some cases, your competition entry may be shared with

the promoter and this will be specified when you enter. If you win a competition, your contact information will be used to notify you as the winner and to award the relevant prize. We will publish your name on our website and indicate the prize you have won.

- **To participate in a survey or poll**

We conduct surveys and polls that we use to produce original research from our readers. Your participation is entirely voluntary. You may consent to Quare Media Limited contacting you at the email address provided to participate in this research. We do not track individuals but look at the information in the aggregate. Any opinion you express, therefore, is anonymous.

From time to time, upon completing a survey or poll, we may ask for your email address for competition, promotional or gifting purposes. Participation is entirely voluntary and this information is processed and stored separately from the information you provide us for the survey or poll. Where you provide this information to us, it will be processed only to administer the competition or promotion.

To deliver our content to you

- **To provide you with an email newsletter**

We offer email newsletters to non-subscribers and subscribers. We will only send you these newsletters with your explicit consent. We collect and use your information to send you the newsletter(s) you have requested and in

some cases to personalise the email we send. You can opt out at any time by unsubscribing at the bottom of each email newsletter communication.

- **To share our content**

We provide tools that enable users of our services to share or forward our content to a nominated email address. If someone else shares our content with you, we may temporarily collect your email address for the purpose of sharing the requested content. We will only use this information to fulfil the sharing request and this contact information is not retained by us. By providing us with your email address, the third party that initiates the sharing request indicates they have your consent to share our content with you.

- **To recommend content**

We may use aggregate information we collect about you to suggest and recommend tailored content. By understanding which content you find useful or interesting, we can recommend more content that you might also like, as well as continuing to produce the most valuable content to meet your needs. This processing is necessary for the purpose of our legitimate interest in delivering relevant content to our readers. You have the right to object to this processing, and if you wish to do so please visit the My Preferences section of My Account or contact us at info@quaremedia.com

- **To provide an alert service**

Quare Media Limited offers a number of email alert services. With your consent, we will process your personal details for the purpose of sending you the alert service you have requested. If you prefer not to receive these alerts, you can opt out at any time by unsubscribing at the bottom of each email

communication or logging into the relevant alert service and disabling the alert.

To understand how you use our services

- **To track how you gain access to or read our content**

We collect information relating to your use of our services to track how you gain access to or read our content. We use log-in information, cookies and similar technologies, device information and internet protocol (“IP”) addresses to log your use of our services as follows:

- When you sign up for or subscribe to one of our services, we will track and aggregate non-personal information previously collected about you through our services with the personal information provided when you register or subscribe. If we link other data with your personal information we will treat that linked data as personal information for as long as it remains combined. We use this information to evaluate your personal preferences and interests, which under the GDPR may constitute as customer profiling. We do so in pursuit of our legitimate interests which are:
 - To research and improve Quare Media’s products, services, and customer communications
 - To understand which content you find useful or interesting
 - To develop and maintain relationships with our customers and readers

- To deliver relevant content to our readers
 - To understand the demographics of our customers and readers
- You have the right to object to this processing, and if you wish to do so please visit the My Preferences section of My Account or contact us at info@quaremedia.com
- We log technical information that your browser sends us including: the internet protocol (IP) address; browser type and version; time-zone setting; access time; browser plug-in types and versions; operating system; and platform and device type
 - We log usage information about the use of our website and services, including: a history of the pages viewed and other actions taken, including the full Uniform Resource Locators (URL) clickstream to, through and from our site; articles, content and products viewed or searched for; page response times; download errors; length of visits to certain pages; page interaction information (such as scrolling, clicks, and mouse-overs); and methods used to browse away from the page and any phone number used to call our customer service number
 - Technical information, including: the type of mobile device used; unique mobile identifies, such as the devices IMEI number; mobile network information; the mobile operating system; the type of mobile browser used; and the time-zone setting
 - Details of our mobile applications used including but not limited to: traffic data; location data; weblogs; and other communication data and the resources accessed

- Some of our location-enabled services require your personal GPS location data for the feature to work. If you wish to use a particular feature, you will be asked to specifically consent to your data being used for this purpose. This consent can be withdrawn at any time.
- We use cookies and similar technologies to facilitate our Services in the retrieving of your user preferences; to personalise your visits; for the operation of our website; to collect statistical information about our visitors for analytical purposes (we use Google analytics and Comscore); to simplify any sign-in procedures; and to provide social media features. We use some of the information you provide to personalise your experience with us as you use our Services, such as addressing you personally and making navigation on our sites easier. For more information on the use of cookies and similar technologies, please see our Cookie Policy.

- **To measure the effectiveness of our email communications**

We use such technologies to determine whether you've opened an email communication from us or clicked on a link contained in an email. Collecting information in this manner allows us to gather statistics about the usage and effectiveness of our services and products, including our email newsletters and direct marketing communications, in our legitimate interest.

To support our advertising services

Third-party vendors, including Google, display advertising on our Services. Some of the ads you see are targeted based on interests that have been inferred from the type of content you view when visiting our site or other sites. This type of behavioural advertising is targeted towards groups of users in an anonymous and aggregated manner as opposed to you as an individual. Such online advertising helps support the content, products and services we provide.

The third-party vendors (such as advertising networks) use third-party cookies together to inform, optimise and serve ads based on your browsing activities and interests. When you visit our Site, your browser redirects to the third party vendor and information is transmitted from from your browser to this third party vendor. Any information transmitted to advertisers and advertising networks in this manner is non-personally identifiable.

Advertising networks may use cookies and similar technologies to track you in order to measure the effectiveness of the ads they serve, detect fraudulent traffic, or to create a browsing profile that is used to deliver more relevant ads. For more information on how to manage advertising cookies please visit our cookies policy.

Other

- **To correspond with you**

If you correspond with us, we will use your contact information to respond to your enquiry. We process this information in pursuit of our legitimate interests to develop and maintain relationships with our customers and readers.

- **To manage our everyday business needs**

We may use your personal information to manage our every business needs, including for internal purposes such as auditing, data analysis, troubleshooting, accounting, providing customer service, technical support and fraud prevention in our legitimate interest. Our legitimate interest is the effective management of our business.

- **To verify your identity**

To exercise your data rights, we may need to collect additional personal information from you to verify your identity and to process your request.

- **When you provide professional services to us**

You may provide us with your personal information if you provide professional services to us. We process this information so we can administer, manage and pay for the relevant services you provide and as per the terms and conditions of our contract.

Anonymous information we process

We process data in a form that does not, on its own, permit direct association with any specific individual and therefore cannot be reasonably used to identify or contact you. Aggregated and anonymous data is considered non-personal information for the purposes of this privacy policy.

Push notifications

We use app push notifications to inform you about breaking news, live event coverage and other top stories. We do not process any personal information and cannot establish the identity of the users who have subscribed to receive these notifications. We may occasionally use push notifications to send you marketing material which may be of interest to you. You may receive these notifications based on your location, operating device and/or interests that are derived from your use of our Services. You can control your push notification and location settings directly on

your mobile device. It should be noted that iOS devices operate on the basis of opting-in to push notifications whereas Android devices operate on the basis of opting out. .

The legal basis for processing your information

We collect your information for a number of purposes and rely on a number of different legal bases to use your personal information.

To enter into and perform a contract with you

We use your personal information to carry out our obligations arising from any contracts entered into between you and us or to take the necessary steps at your request prior to entering into a contract with us including:

- To provide you with the subscription, services or products you have requested
- To process your payment information
- To authenticate and verify your account
- To provide customer and technical support
- To administer competitions or similar promotions
- To process live chat information at your request prior to entering into a subscription contract with us
- To provide our recruitment services to you when requested

- To pay for the services you may professional provide to us
- To send important notices such as communications relating to payment, delivery services, changes to our terms, conditions, and policies and to notify you about changes to our service
- To keep you informed of the benefits of your subscription
- To ensure you get the most out of your subscription
- To deliver exclusive content and benefits to our subscribers

With your consent, which can be withdrawn at any time

We will, in certain circumstances, rely on your explicit consent to process your personal information. Where we do, you have the right to withdraw your consent at any time. In most circumstances, your consent can be withdrawn by following the unsubscribe instructions included at the end of each email communication from us. You can also contact us at info@quaremedia.com and we will be happy to facilitate your request.

To comply with our legal obligations

We may be required to process your personal information to comply with certain legal obligations to which we are subject, including:

- Providing information to an Garda Síochána, the Revenue Commissioners or other Government bodies or agencies when required to do so by law

- If you have exercised one of your data rights, we will retain a copy of all correspondence to demonstrate our compliance with data-protection legislation
- If you have exercised one of your data rights and ask us not to contact you by email at a particular email address, we will need to retain a copy of that email address in order to comply with your no-contact request
- To carry out our statutory audit

Processing based on our legitimate interests

We process your personal information for carefully considered and specific purposes which are in our legitimate interests and enable us to enhance the services we provide, but which we also believe benefit our customers. Our legitimate business interests do not automatically override your interests. You have the right, free of charge, to object to our use of your personal information for our legitimate interests. If you wish to do so contact us at info@quaremedia.com. Please bear in mind that if you do object, this may affect our ability to carry out certain tasks for your benefit.

Where you object to our use of your personal information for our legitimate interests, we may continue to process your personal data, despite your objection, where there are compelling legitimate grounds to do so. We will always ensure there is a fair balance between our legitimate interests and your fundamental right and freedoms. We process personal information for the following legitimate business purposes:

- To manage our everyday business needs and for internal purposes such as auditing, data analysis, troubleshooting, accounting, providing customer service, technical support and fraud prevention
- To provide you with a more personalised experience, such as making content recommendations
- To understanding which content you find useful or interesting
- To support our advertising services

- To determine the effectiveness of promotional campaigns, email campaigns and advertising
- To research and improve The Irish Times' products, services, and customer communications
- To ensure content from our site and mobile applications is presented in the most effective manner for you and for your device
- To develop and maintain relationships with our customers and readers
- To better understand and improve the usability, performance, and effectiveness of our Services
- To protect you against fraud and to detect, prevent, investigate security or technical issues to ensure our Services are secure
- To protect the rights, property and safety of Quare Media Limited or the rights, property or safety of our employees or others
- To verify student credentials and assess the eligibility for a free subscription
- To understand the demographics of our customers and readers
- To send direct marketing to our subscribers or former subscribers.

When and how your information is shared

Within our group

We may share your personal information with any member of our company and use it in a manner that is consistent with this privacy policy.

With third parties

We may share your personal information with third parties for a number of reasons as outlined below. We do not sell your personal information to anyone and only share it with third parties who are facilitating the delivery or fulfilment of our services and or are working on our behalf. We contractually require that our suppliers protect such information from unauthorised access, use, and disclosure.

Third-party service providers

We may share your personal information with third-party service providers which perform services and functions at our direction and on our behalf such as our accountants, IT service providers, printers, payment providers, lawyers, providers of security and administration services and other business advisers.

Third-party service partners

We provide certain services and run promotions in conjunction with third parties and we may share your personal information if the service you have requested is fulfilled by them. These third parties have their own security and privacy policies. You are advised to review these separately.

Third-party data controllers

We may share your personal information with third parties that may receive and process your personal information as a data controller in their own right. In the context of delivering an order or product to your address, we will share your shipping information with our delivery partners who will use it for the purposes of picking up, delivering and tracking your shipment. Our delivery partners may further use this information to plan delivery routes, to optimise and improve transportation operations and to enhance route and network planning tools such as maps, etc. As such, these third parties act as a data controller in their own right in respect of any shipping information that they hold. You can obtain more information about the delivery partners we use, how they process and treat your personal information and how to exercise your data rights by contacting us at info@quaremedia.com

Third-party advertisers

We disclose non-personally identifiable anonymous information to third-party advertisers to help them reach the kind of audience they want to target. We share summary aggregate reports for our advertisers to measure the effectiveness of the ads they have served. These advertising parties may combine the information we send with other information that you've provided to them or that they've collected from your use of their services.

Independent auditors

We may share your personal data with a third-party auditing organisation (ABC) in accordance with our legitimate interests to verify aggregated statistics about circulation and usage of our products or to review our policies, processes and procedures for compliance with relevant standards.

Third-party recruiters and clients

If you apply for a job posting on our "Executive Jobs" website, or if you explicitly enable recruiters to see your profile and CV in your candidate account settings, the personal information you provide to us (including sensitive information) may be shared with third-party recruiters and clients.

Social networking sites

Our website and mobile applications use interfaces with social media sites such as Facebook, LinkedIn, Twitter and others. If you choose to like or share information from our sites through these services, you should review the privacy policy of that service. If you are a member of a social media site and logged in, the interfaces configured on our Services allow the social media site to connect your site visit and browsing behaviour to the personal data held on your social media site. Quare Media Limited can use this information on an aggregate basis to place ads that are based on your interests on these social media sites. These practices are governed by the privacy statements of these social networking sites and you are advised to review these separately.

Data storage and retention

We will retain your personal information as needed to fulfil the purposes for which it was collected. We will retain and use your personal information no longer than is necessary to comply with our business and legal obligations. Where we enter into a legal contract with you, we will hold your personal information for a period of seven years from the date of completion of this contract by reference to the statute of limitation for a legal claim under contract.

Your data rights

You have several rights under data-protection law in relation to how we use your personal information. You have the right, free of charge, to:

- Request a copy of the personal information we hold about you in a structured, commonly used and machine readable format
- Rectify any inaccurate personal information we hold about you
- Withdraw your consent where we have relied upon your consent to process your information
- Erase the personal information we hold about you subject to certain exceptions
- If technically feasible, have your personal information transmitted to another data controller in a machine readable format at your request
- Restrict processing of your personal information in certain circumstances
- Object to our use of your personal information for our legitimate interests, for profiling and for direct marketing purposes
- Not be subject to a decision which is based solely on automated processing where that decision produces a legal effect on you or otherwise significantly affects you. We do not make automated decisions of this nature
- [Lodge a complaint](#) with the appropriate data-protection authority if you have concerns about how we process your personal data

These rights are in some circumstances limited by data-protection legislation. If you wish to exercise any of these rights please contact us at info@quaremedia.com. We will take measures to verify your identity which we will do by reference to copies of acceptable identification documentation supplied by you.

We will endeavour to respond to your request within a month. If we are unable to deal with your request within a month we may extend this period by a further two months and we will contact you and explain why.

Consequences of not providing information

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Processing for journalistic purposes

As a news publishing organisation, Quare Media Limited processes personal data for the purpose of exercising the right to freedom of expression and information and for journalistic purposes.

This processing is exempt from compliance with certain obligations of the GDPR.

- We may process your personal information for journalist purposes where you submit content to be published online and in our printed publications
- Where you have voluntarily contributed your experience to us and we publish this information
- If we publish comments you have made about Quare in a public forum for example on social media.

- If you participate in one of our discussion forums

It is important to understand that certain rights which you have in relation to your personal information may not apply where that data is processed for journalistic purposes.