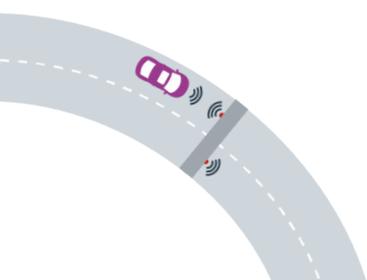


# eFlow Privacy Statement

**Introduction**



# eFlow Privacy Statement

This eFlow website is currently operated by emovis operations Ireland on behalf of Transport Infrastructure Ireland (“TII”). eFlow and TII fully respect your right to privacy, and treat all data collected through this website in accordance with applicable data protection laws.

TII was established following the statutory merger of the National Roads Authority and the Railway Procurement Agency under the Roads Act 2015. TII is the data controller in respect of this data and its main address is Parkgate Business Centre, Parkgate Street, Dublin 8, D08 DK10, Ireland.

emovis operations Ireland is an Irish company that currently processes personal information on behalf of TII in order to operate the barrier-free tolling system on Dublin’s M50 motorway and provide electronic tags for use on all toll roads in the Republic of Ireland related to eFlow toll services. We can be contacted:

- **by post: Data Protection Officer, eFlow, Cape House, Westend Office Park, Dublin 15, D15 Y9DV**
- **by using our [contact form](#)**
- **by email: [dataprotection@eflow.ie](mailto:dataprotection@eflow.ie)**

Please read the terms of this privacy statement carefully, as by visiting this website you will be deemed to have accepted the terms of this privacy statement. If you are not happy with this website privacy statement you should not use this website. You may also wish to review our [Data Protection Notice](#).

## Collection and use of personal information

We will collect no personally identifying information about you when you visit this website unless you choose to provide that information to us. The information we collect depends on options selected when visiting this website.

If you visit this website to browse, read or download we automatically collect and store your IP address, browser type and length of user sessions. We use this information to help us make this website more useful to visitors, to learn about the number of visitors to this website and the type of technology that our visitors use. We do not track or record information about individuals on their visits. We may compile and report aggregate statistics about our users in terms of numbers, traffic patterns and related site information. Any such statistic will not include any personally identifying information.

You may choose to provide us with personal data associated with some of the services provided on the website, for example, register and manage your eFlow account, make a payment or contact us with your enquiry.

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If you open an account, we ask you to provide us with your full name, email/postal address, contact telephone number, licence plate number, and credit card, debit card or direct debit details. We use this data for the purposes of processing your toll payment(s) and managing your eFlow account. We do not collect any more personal data than is necessary for these purposes.

M50 users, who do not wish to register with eFlow, have an option to make a payment on this website by using the 'Pay a Toll', 'Pay a Penalty' facility. For this purpose, we ask you to provide us with the licence plate number, journey reference number and credit or debit card details. If you require a receipt, we will request your email or postal address from you.

The M50 users who are registered with another tag provider, but have received an eFlow penalty letter, can appeal the penalty on this website by using the 'Appeal a Penalty' option. We will ask you to complete the form requesting the journey reference number, your licence plate number, the tag provider and your tag number.

Whenever you use a 'contact us' form to communicate with us you may choose to provide us with the following:

- **Full Name, email/postal address, phone number;**
- **Account number/Vehicle registration number;**
- **Attached documentation (proof of payments, etc.).**

Collected information is used solely for dealing with your query. Your personal data is stored securely and kept for no longer than is necessary.

From time to time, we may contact you, with your consent, using your email address in relation to Customer Satisfaction Surveys. You have the right to opt-out from receiving the email from us by emailing us at [dataprotection@eflow.ie](mailto:dataprotection@eflow.ie) or writing to us.

## Purpose of Processing and Legal Basis

eFlow processes personal data in order to:

- (a) ensure that payment is obtained from all road users using eFlow services in accordance with TII's statutory obligations;
- (b) receive services from third party service providers;
- (c) respond to queries and complaints; and
- (d) comply with TII's other statutory obligations.

TII's legal basis for collecting and using this information is that such processing is necessary to comply with TII's legal and regulatory obligations and to carry out its tasks in the public interest and/or in the exercise of official authority vested in TII. In certain limited

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circumstances processing your personal data may be on the basis of your consent – where this is the case you will be asked to give a positive indication of that consent.

The legal basis on which we collect, process and transfer special categories of data relating to you (e.g. if you claim exemption from the payment of tolls on the grounds of modified vehicle/driver disability status, proof that the vehicle is modified and information about your disability status may be requested) in the manner described above are that:

- (a) this is necessary for reasons of substantial public interest; and
- (b) you have given your explicit consent to such processing.

## Disclosure of Personal Data

We may disclose your personal data to other organisations in connection with the above purposes, in the following circumstances:

- (a) We may share personal data with our agents, contractors and service providers who assist us with the operation of aspects of our services and functions, such as our payment card processor, banking and printing/postal correspondence contractors, eFlow enforcement entity, Foreign Vehicle Licencing Authorities and law enforcement agencies.
- (b) Where we appoint a new operator of eFlow, we may share personal data with this new operator in order to facilitate successful transition to the new operator and ensure continuity of service for eFlow customers during any transition period.
- (c) If you send us a comment, complaint or query in relation to a matter that we are not responsible for, we will ask for your permission to pass on your communication to the relevant third party.
- (d) Where we are under a duty to disclose or share personal data in order to comply with any legal obligation, or to protect the rights, property or safety of eFlow, our customers, or others. We may also share information about the way you conduct your account with credit reference agencies.
- (e) Where required or permitted by law, we may share your personal data with other public authorities and bodies, such as the Gardaí or other law enforcement authorities for the purposes of the prevention, investigation or detection of crime.
- (f) In connection with the provision of interoperable toll transactions in Ireland, we may disclose your personal data to a relevant compatible operator.
- (g) We may share toll passage data with key stakeholders, e.g. the Department of Transport, for the purpose of research and statistical analysis. (NEW)

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- (h) For the purpose of operating competitions on behalf of TII we may disclose, with your consent, your name, email address and marketing preferences provided to us by you.
- (i) Where we are otherwise permitted by law.

## Cookies

This website uses cookies, so a cookie may be placed in your internet browser. Cookies are small texts which provide us with information about how often someone visits our website, and what website activity is carried out during those visits. Cookies do not themselves contain any personally identifying information but if you provide information to us, it may be linked to the data stored in the cookie.

If you do not want your browser to accept cookies, you can turn off the cookie acceptance option in your browser settings. Disabling cookie support may prevent this website from functioning properly and you may not be able to utilise fully all its features and information.

For more information about the way this website uses cookies click [here](#).

## Transfers Abroad

In connection with the above, eFlow may transfer your personal data outside the European Economic Area, including to a jurisdiction which is not recognised by the European Commission as providing an equivalent level of protection for personal data as is provided for in the European Union. If and to the extent that eFlow does so, eFlow will ensure that appropriate measures are in place to comply with its obligations under applicable law governing such transfers, which may include entering into a contract governing the transfer which contains the 'standard contractual clauses' approved for this purpose by the European Commission and/or other transfer obligations/arrangements as may be specified by Commission. Further details of the measures that eFlow has taken in this regard are available from the eFlow Data Protection Officer, using the [contact details](#) on Page 2 above.

## Security

For website security purposes and to ensure that this website remains available to all users, our computer system employs software programs to monitor network traffic in order to identify unauthorised attempts to upload or change information or otherwise cause damage. Unauthorised attempts to upload information or change information on this website are strictly prohibited and may be punishable by law.

Your personal data which you provide to us will be held on secure servers hosted by emovis operations Ireland. The nature of the internet is such that we cannot guarantee the security of any information you transmit to us online. However, we take all reasonable steps

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(including appropriate technical and organisational security measures) to protect your personal data.

## Your Rights

You have the following rights, in certain circumstances, in relation to your personal data:

- the right to access your personal data;
- the right to request the rectification and/or erasure of your personal data;
- the right to restrict the use of your personal data;
- the right to object to the processing of your personal data;
- the right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format or to require us to transmit that data to another data controller, and
- where our processing of your personal data is based on you having provided consent, the right to withdraw your consent to the processing at any time.

In order to exercise any of the rights set out above, please contact us using the [contact details](#) on Page 2 above.

## Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Our retention periods differ depending on the type of categories of personal data held. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## Changes to this Privacy Statement

From time to time we may decide to change our privacy statement, but any changes will be posted on this page to keep you up to date on how we collect, use and disclose information. If at any time we decide to use personal data in a manner significantly different from that stated in this privacy statement, or otherwise disclosed to you at the time it was collected, we will notify you, and you will have the choice as to whether or not we use your information in the new manner.

## Questions and Complaints

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If you have any questions or complaints about our use of your personal data, please contact us using the [contact details](#) on Page 2 above. Alternatively, TII's Data Protection Officer may be contacted as follows:

- **by post: Data Protection Officer, Transport Infrastructure Ireland, Parkgate Business Centre, Parkgate Street, Dublin 8, D08 DK10**
- **by phone: +353 1 646 3600**
- **by email: [dataprotection@tii.ie](mailto:dataprotection@tii.ie)**

Further information about data protection can be found on the Data Protection Commission's website: [www.dataprotection.ie](http://www.dataprotection.ie).

You also have the right to lodge a complaint with the Data Protection Commission if you are not happy with the way we have used your information or addressed your rights. Details of how to lodge a complaint can be found on the Data Protection [Commission's website](#).

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[www.eflow.ie](http://www.eflow.ie) @eflow\_freeflow

Cape House, Westend Office Park, Blanchardstown, Dublin 15. D15 Y9DV