

## Privacy Statement

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### 1. Introduction

- 1.1 This M50 Quick Pay App (“**App**”) is 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 App in accordance with applicable data protection laws.
- 1.2 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.
- 1.3 emovis operations Ireland is an Irish company that 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)
- 1.4 Please read the terms of this privacy statement carefully, as by using this App you will be deemed to have accepted the terms of this privacy statement. If you are not happy with this privacy statement you should not use this App. You may also wish to review our Data Protection Notice [HERE](#)

### 2. Collection and use of personal information

- 2.1 We will collect no personally identifying information about you when you use this App unless you choose to provide that information to us. This may include:
  - Credit or debit card information;
  - licence plate number;
  - email address;
  - phone number, and
  - password.
- 2.2 The information we collect depends on options selected when using this App.
- 2.3 If you download our App we automatically collect and store your IP address and length of user session. We use this information to help us make our App more useful to visitors, to learn about the number of users and the type of technology our users use. We do not track or record information about individuals during their use of the App. We may compile and report aggregate statistics about our users in terms of numbers,

traffic patterns and related information. Any such statistic will not include any personally identifying information.

- 2.4 If you register, we ask you to provide us with your email address, phone number and a password. We use this data for the purposes of providing you with an account on the App and managing your account. If you use the App to make a toll payment, we will also collect your licence plate number and credit or debit card details.

### 3. **Purpose of Processing and Legal Basis**

- 3.1 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 from members of the public, and
- (d) comply with TII's other statutory obligations.

- 3.2 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 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.

- 3.3 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.

### 4. **Disclosure of Personal Data**

- 4.1 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 and law enforcement agencies.
- (b) If you send us a comment, complaint or query in relation to a matter that we are not responsible for, we will ask you permission to pass on your communication to the relevant third party.
- (c) 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.

- (d) 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.
- (e) In connection with the provision of interoperable toll transactions in Ireland, we may disclose your personal data to a relevant compatible operator.
- (f) 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.
- (g) Where we are otherwise permitted by law.

## 5. **Security**

- 5.1 For security purposes and to ensure that this App 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 App are strictly prohibited and may be punishable by law.
- 5.2 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 (including appropriate technical and organisational security measures) to protect your personal data.

## 6. **Your Rights**

- 6.1 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.
- 6.2 In order to exercise any of the rights set out above, please contact us using the contact details in Section 1.3 above.

## 7. **Retention**

- 7.1 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.
- 7.2 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.

## 8. **Changes to this Privacy Statement**

- 8.1 From time to time we may decide to change our privacy statement, but any changes will be posted here 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.

## 9. **Questions or Complaints**

- 9.1 If you have any questions or complaints about our use of your personal data, please contact us using the contact details in Section 1.3 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)
- 9.2 Further information about data protection can be found on the Data Protection Commission's website: [www.dataprotection.ie](http://www.dataprotection.ie).
- 9.3 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](#)