



EIRCODE

Code of Practice

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Version 3



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Foreword

The Code of Practice

This Code of Practice outlines how the National Postcode System, known as ‘Eircode’, will be made available to the Irish public. It outlines how the system and its agents will do this in line with the law, and it identifies your legal rights and entitlements in relation to Eircode. This document also outlines how the Code was created. We hope it answers your questions and that you find it useful.

The National Postcode System was introduced in 2015 on behalf of the Minister for the Department of Communications, Energy and Natural Resources. This Department has licensed an Eircode Contractor to manage Eircode Services.

The current Eircode Contractor is Capita Business Support Services, Ireland, Limited (Capita).

Associated Policies

More information regarding privacy, how data is handled and the licences we issue can be found in the following documents:

- ◆ the Eircode Contractor’s Privacy Statement, published on our website, eircode.ie;
- ◆ the Eircode Acceptable Use Policy, also published on our website;
- ◆ Data Retention Policy, available from the Eircode Contractor on request;
- ◆ the Eircode Provider Licence Agreement, available to Eircode Providers on request.

Contracts and Agents

The Contractor is authorised by the Minister to issue licences to other organisations to use the Eircode data. These organisations will either be:

- ◆ **Direct End Users** (such as banks, public bodies, and so on) who will use Eircodes alongside their existing data, or
- ◆ **Eircode Providers (EPs)** who will either add information to the Eircode data or offer a service to their customers.

The Contractor is also responsible for managing a public register of EPs, administering its complaints process and monitoring compliance of EPs’ services.

The EPs and Direct End Users will be data controllers in their own right. That means that they will be responsible for the lawful processing of the Eircode data along with personal information which they may process on behalf of their end users.

The Eircode database managed by the Contractor does not hold personally identifiable information. The database contains the addresses of about 2.2 million properties throughout the country, alongside their associated Eircode.

However, the services being offered by EPs may involve the processing of personal data. This means that the Contractor will help to make sure that the services offered by the EPs comply with the data protection legislation.

Governance and Control of the Eircode Services

Under the recently published Communications Regulation (Postal Services) (Amendment) Act, 2015 (the Postal Services Amendment Act), the Contractor will monitor and audit the activities of EPs. This will help to ensure Eircode-related services comply with the Postal Services Regulation and with the Irish Data Protection Acts.

This obligation will include seeking evidence from each licensed EP that their services and professional activities comply with the law. This will be achieved through regular audits of the books and records of each EP.

The Licence Agreement issued by the Contractor to each qualifying EP will make it clear that each EP must ensure that its data management activities and services comply with the law. If there is an issue with EPs' licences, the Contractor will have the authority to revoke, suspend or terminate these licences.

1 Introduction

Capita, the Eircode Contractor (the Contractor), was appointed by the Minister for Communications, Energy and Natural Resources in 2013 to develop and manage the postcode system (Eircode) for Ireland.

To construct the Eircode database, the Contractor used source data supplied by An Post GeoDirectory Limited, which gets information from:

- ◆ Ordnance Survey Ireland;
- ◆ The Placenames Branch at the Department of Arts, Heritage and the Gaeltacht, and
- ◆ the Universal Service Provider for postal services in Ireland, An Post.

Addresses used are the 'postal addresses' defined and maintained by An Post.¹

Based on this source information, the Contractor generated unique 7-digit Eircodes which will be assigned and sent to each of the 2.2 million corresponding postal addresses.

This document:

- ◆ explains what an Eircode is and the benefits of using Eircodes;
- ◆ explains how Eircodes are generated, assigned and disseminated;
- ◆ explains the Eircodes complaints policy and procedures;
- ◆ explains data protection and privacy policies;
- ◆ provides a list of useful contacts.

¹ The term 'Postal Address' always refers to a delivery address as defined by Irish Standard - I.S. EN 14142-1:2011 (Postal services. Address databases), as operated by the Universal Service Provider, An Post.

2 Eircode Overview

2.1 Addresses in Ireland

In 2014, Ireland had 2.2 million postal addresses. They can be broken down into two categories as follows:

- ◆ Non-Unique Addresses (NUAs)
- ◆ Unique Addresses (UAs)

Non-Unique Addresses (NUAs)

NUAs include:

- ◆ a group of houses, often in rural locations, which share the same address;
- ◆ an address point which is indistinct from a neighbouring address;
- ◆ addresses that usually contain only a townland and county as an address identifier.

Over a third (35%) of address points are NUAs by address alone, although they can be differentiated by their geographical coordinates. This makes it harder to identify an individual address within a group or cluster of NUA addresses.

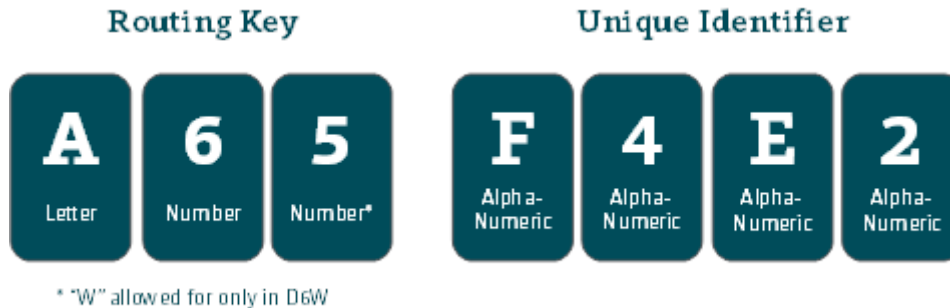
Unique Addresses (UAs)

Unique addresses are where an address is uniquely identifiable by a building name or a number – for example, 1 Station Road, Maynooth, County Kildare.

Almost two thirds of addresses are unique.

2.2 The Structure of an Eircode

An Eircode is a seven-character postcode consisting of two elements – a Routing Key and a Unique Identifier. These are explained below.



1. **Routing Key** – this has three characters, consisting of a letter-number-number (with the one exception of postal town Dublin 6W), which identifies the principal postal town related to the building or property’s postal address. The principal postal town is assigned using the Source Data, and there are 139 different postal town references currently in use.
2. **Unique Identifier** – this has four characters, consisting of a combination of letters and numbers. This identifier is unique to each property within a principal postal town.

2.3 Assigning Eircodes

Eircodes are created and assigned in line with the National Postcode System (NPS) Report.

The Contractor assigns an Eircode to every postal address. This data contains:

- ◆ the postal address (including the house number where applicable);
- ◆ the geographical address, and
- ◆ map coordinates.

The Contractor will assign Eircodes to:

- ◆ each individual postal address – for example, a single residential house;
- ◆ single, standalone commercial units;
- ◆ buildings that have **more than one residence with postal addresses** – a unique Eircode will be assigned to each individual residence – for example, each apartment within an apartment block;



- ♦ buildings that contain **multiple residences, but have only one postal address** associated with the building – the building’s postal address will be assigned a single Eircode. Each individual residence will not be assigned an Eircode, as their addresses are not recorded in the Source Data – for example an address with multiple bedsits;
- ♦ commercial buildings that contain more than one business. Only businesses that are identifiable by having a sub-building address – for example, a Unit, Studio or Suite number, as part of their postal address – will be allocated a unique Eircode. For example, a shopping centre with allocated, identifiable units.

The following are some examples of when a unique Eircode will or will not be assigned:

	A unique Eircode will be assigned to:	A unique Eircode will not be assigned to:
Residential Address	<ul style="list-style-type: none"> ♦ each house on a street; ♦ each flat in an apartment block; ♦ each unit within a duplex unit. 	<ul style="list-style-type: none"> ♦ residential buildings with multiple flats/bedsits that are not indicated as separate addresses on the outside of the building; ♦ caravans and temporary dwellings.
Commercial addresses	<ul style="list-style-type: none"> ♦ each address identifiable by Unit; Level; Suite number; Studio number in: <ol style="list-style-type: none"> a. an office building b. a shopping Centre c. a business Park d. an industrial Estate 	<ul style="list-style-type: none"> ♦ buildings with one or more registered businesses where a business is not recorded in the source data provided by An Post; ♦ an office building with multiple businesses but without uniquely identified sub-building addresses.

An Eircode is associated with an address, rather than with the person(s) or businesses occupying a building or property. Therefore, the **Eircode is not transferable from one address to another**. For example, if a person or business moves to a new address, the Eircode from the old address remains with the old address and the person(s) or businesses will use the Eircode assigned to their new address.

2.4 Impact on Existing Postal Addresses

Existing postal address information will not be effected by Eircodes. You should treat an Eircode as an additional line in your existing postal address.

2.5 The Eircode Finder

The Contractor provides the Eircode Finder, a web-based facility, which you can use to find an Eircode for an individual postal address, or input an Eircode in order to find its associated postal address.

Non-unique addresses can also be found on the Eircode Finder facility by using the map facility. For example, if a person lives in a property in Ireland that has a non-unique postal address, the Eircode Finder facility provides a detailed, map of their area. By locating their property on this map and aligning the marker over the map location, the Eircode Finder will display the Eircode assigned to that property.

Neither the source data nor the Eircode itself contain personal information about an individual or business at that address.

2.6 Using an Eircode is not Compulsory

While an Eircode will be assigned to every property in Ireland, the Eircode itself does not contain personal information in relation to any individual.

So, while you may decide not to use the Eircode in your postal address or correspondence, the occupant of the property cannot ‘opt out’ of the legitimate use of the Eircode for that property by others.

It is likely that a large number of commercial and Government organisations will soon begin using Eircodes as they will help to:

- ◆ clarify non-unique addresses;
- ◆ improve accuracy of goods and services;
- ◆ reduce the risk of fraud and misunderstanding;
- ◆ improve success in response to ‘call-outs’ of the emergency services, and so on.

So, even if you choose not to use the Eircode, you are likely to see the Eircode appearing on your mail, correspondence and packages delivered to your address.

There is also a possibility that commercial organisations, State and semi-State bodies will begin using the Eircode as a ‘required field’ in application forms. This will help to improve the quality of the data. It will also reduce the risk of misunderstanding non-unique addresses.

Any organisation deciding to make the Eircode a ‘required’ field must make sure that their reason for doing this is consistent with the lawful conditions².

² The Lawful Processing Conditions in the Irish Data Protection legislation.

These conditions include providing an Eircode where it is:

- ♦ defined in the terms and conditions of a contract, or where it is a legal obligation;
- ♦ necessary for preventing injury or damage to health and/or prevention of loss or damage to property;
- ♦ necessary in the vital interests of the individual to whose property the Eircode relates;
- ♦ necessary to administer justice or a lawful function, for example, the activities of a State or semi-State body;
- ♦ necessary in the legitimate interests of the organisation seeking the data.

If an organisation cannot justify the use of a 'required' field for an Eircode under at least one of the conditions, it should reconsider making it a requirement.

Companies using the Eircode system must comply with relevant regulations³ and with the Contractor's Acceptable Use Policy (see Appendix A).

Under Data Protection legislation, you can opt out or prevent your personal data from being used for certain purposes, such as direct marketing, promotional and sales campaigns.

If you choose to opt out from a postal direct marketing campaign, this will also apply to your Eircode, since the Eircode will be an additional item of detail in your postal address. For more information on the right to opt out from direct marketing campaigns, please see section 6.6.2 (below).

However, you **cannot object** to the use of the Eircode in isolation.

For example, if you receive correspondence which includes your Eircode in the address, you **cannot demand** that the sender removes the Eircode from the address in future correspondence.

2.7 Public Sector Bodies

As part of the introduction of Eircodes, the Contractor has already processed the addresses held by some public sector bodies, and has assigned an Eircode to each unique address.

This means that you are likely to see correspondence from public sector bodies with the Eircode for your property listed.

If you believe that the Eircode being used is incorrect, contact the relevant public sector body to let them know. If the Eircode is incorrect, the Contractor will work with that public sector body to correct it.

³ Irish Postal Services and Data Protection regulations.



The public sector bodies which have already added the Eircode to their address lists include:

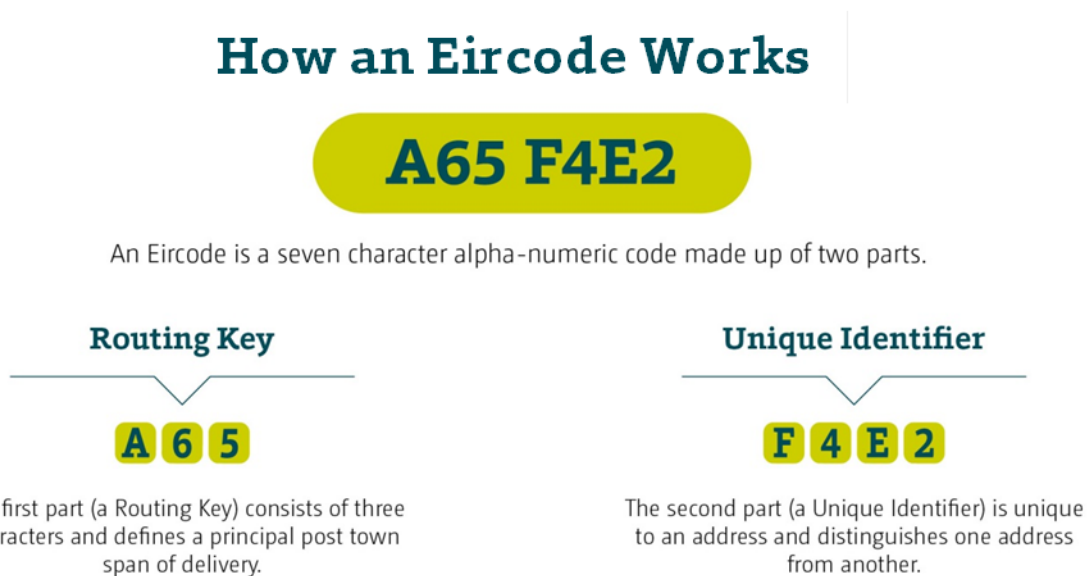
Social Protection	Environment - Agresso
Agriculture	Environment - Electoral Register
Central Statistics Office	Environment – Local Authority Rates
Company Registration Office	Foreign Affairs - Holder Address
Education - Bank Branches	Health
Education – Financial Management Systems	National Treasury Management Authority
Education - General	Private Residence Tenancy Board
Education - HR data/Pensions	Revenue
Education – Post-Relational Data Base (PRDB)	Road Safety Authority
Education - Staff Payroll	Private Residence Tenancy Board
Education - UDMDB	Company Registration Office

3 Eircode Service

This section provides an overview of the Eircode Service.

3.1 How Eircodes Work

Each home, business and government building will receive an Eircode. The diagram below explains how Eircodes have been designed.



The Eircode is seven characters in length, and divided into two parts – a three-character Routing Key and a four-character Unique Identifier.

Similar to postcodes in other countries, part of the Eircode design is to help the parcel and postal industry. As a Routing Key will be shared by many properties in an area, it will become as familiar to you as area codes for landline telephones. The first letter is not directly linked to counties, towns or other geographic features (either in English or in Irish) except for existing established Dublin postal districts 1 – 24, which are being retained in the Routing Key as D01 to D24.

The second part of the Eircode has four characters drawn from a carefully selected set of letters and numbers that identify each address. The Unique Identifier for each house or business will not be in sequence – for example, the row of houses along one street will not have the codes ABC1, ABC2, ABC3, and so on. This will help to avoid a situation where a new building is built between two existing buildings with assigned Eircodes, and thus require all the Eircodes in the area to be changed.

Eircodes of adjacent (side-by-side) addresses will have unique identifiers – in other words, they will be different. This avoids possible miscommunication, particularly in rural areas where most addresses do not have an identifying number or name.

3.2 How to use an Eircode

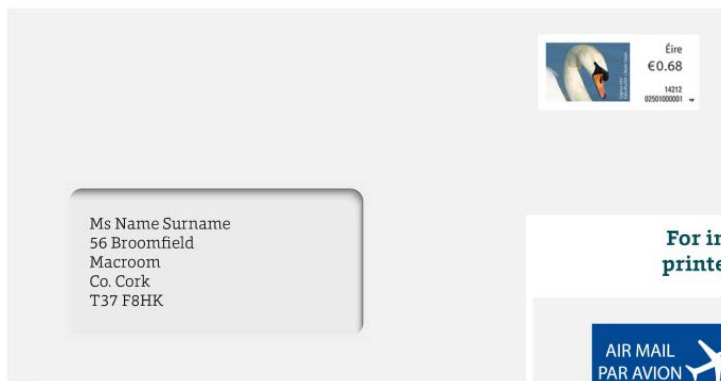
Examples of how to include an Eircode in an address can be seen in the table below. Please note that the Eircode system does not change or remove your choice to use your existing address.

Scenario	Action
Address before Eircode	37 Whereabouts Drive Any Town Kinsale Co Cork
Eircode Address	37 Whereabouts Drive Any Town Kinsale Co Cork Eo6 7167

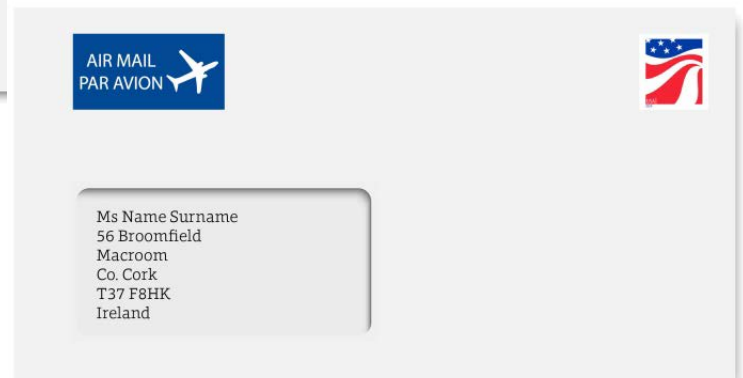
3.3 Positioning the Eircode on postal items

The Eircode should appear in capital letters on its own line on postal items. The Eircode should be printed using a three plus four format – that is the Routing Key, space, Unique Identifier (example: T37 F8HK).

For domestic post the Eircode should be printed as the last line of the address:



For international post the Eircode should be printed above the country on a separate line:



3.4 Using Eircodes online or in a form

Using an Eircode online or in a form will vary depending on how a company presents their forms. Companies are advised to provide a specific field called 'Eircode' with spaces for seven characters. Existing forms and websites may not provide specific character fields. However, you should be able to enter your Eircode into currently defined 'postcode fields'.

3.5 How to find an Eircode

There are two main ways to find out the Eircode for an address: notification letters and the Eircode Finder tool.

3.5.1 Eircode Notification Letter

The Contractor will send Eircode notification letters to each corresponding postal address.

The Contractor will use information from An Post to update addresses every three months. In this way, the Contractor will be updated on new and changed addresses. It can then issue updated notification letters as required.

3.5.2 Eircode Finder Tool

The Eircode Finder is a free tool available on the Eircode website (www.eircode.ie). You can use it to search by entering an address to find an Eircode, or an Eircode to find an address.

You can use a GPS-enabled smart phone or other devices that can provide location information to determine your location on an interactive map with the 'Use My Location' facility.

This service is provided for individual, personal use, so the Contractor will limit your access to this tool to 15 'look-ups' a day.

The Contractor will use cookies to track the number of times the Eircode Finder is accessed from your device.

In line with the law⁴, visitors to the Eircode Finder web page will be told that these cookies are in place. The Eircode Finder page will also give other relevant information.

⁴ SI 336 of 2011 (the ePrivacy Directive)

The Contractor will also use Google Analytics to collect information about visitor behaviour – pages visited, services accessed, and so on – on the Eircode website. This analytics data does not identify the individual user. **However, in some circumstances, it can capture the IP address of the user, and this address along with other data that might be available, can be used to identify you.**

If the Contractor captures personal information about you, they must process, store and manage that information in line with the Irish Data Protection Legislation.

The Contractor will also publish a Privacy Policy on its website providing further details of their commitment to the law, and other relevant information. You can also find out more about Google’s position on privacy as regards its analytics service at:

<http://www.google.ie/policies/privacy/>

Please refer to the terms and conditions, which are available on the Eircode website, for further information.

3.6 Assigning Eircodes

Existing postal addresses in Ireland have been assigned an Eircode. In the future, new Eircodes will be assigned four times a year. New postal addresses will, therefore, get their Eircode in one of these quarterly allocations.

However, the Eircode Contractor’s only source of postal address data comes from An Post GeoDirectory source data. If a postal address is not recorded from this data, then it will not receive an Eircode.

The following section outlines how Eircodes will be assigned before they are launched, and how Eircodes will be assigned afterwards.

- ◆ **For existing postal addresses (Pre-Launch)** – As part of the Eircode Programme, all existing postal addresses were received from the source data. Unique Eircodes were assigned to all of the addresses provided. During July 2015, an Eircode Notification Letter was delivered to each postal address, informing the occupants of the Eircode assigned to that postal address.
- ◆ **For new addresses (Post-Launch)** – Post-launch, the Eircode Contractor will be responsible for managing updates to the Eircode database. This will include the creation, assignment and ‘retirement’ or withdrawal of Eircodes. The following scenarios describe situations where a new Eircode will be assigned:



Example	Detail
<p>Single unit building Example, a new build</p>	<p>When the Contractor receives quarterly updates of new postal addresses, new Eircodes will be assigned to each address and a notification of the Eircode will be delivered to the postal address.</p>
<p>Demolished or single-unit conversion to multi-unit building – existing site Example: building on site of previously demolished building</p>	<p>When the Eircode Contractor receives an update to an existing postal address such as:</p> <ul style="list-style-type: none"> ◆ a demolished building – the Eircode for this building is withdrawn; ◆ a single-unit building replaced with a multi-unit building – the existing Eircode will be ‘retired’ and each new postal addresses will be assigned a new Eircode.
<p>Multi-tenant building – unique address points Example: apartment block; business units within shopping centre</p>	<p>Eircodes will be assigned to all unique postal addresses contained in multi-tenant buildings, on the basis that each sub-building address has a corresponding postal address.</p> <p>Once a code is assigned by the Contractor, an Eircode Notification Letter will be delivered to each postal address. This applies to both commercial and residential buildings.</p>
<p>Multi-tenant building – non-unique address points Examples: A shopping centre containing kiosks A commercial building containing companies that do not have a unit reference in their postal address</p>	<p>Eircodes will be assigned to non-unique postal addresses contained in multi-tenant buildings, on the basis that each address is identifiable by the following words in the sub-building address: Unit #, Level #, Suite #, Studio #, and so on.</p> <p>These types of postal addresses will be assigned an Eircode and an Eircode Notification Letter will be delivered to each corresponding postal address.</p> <p>This applies to both commercial and residential buildings.</p>

3.7 Receiving an Eircode

As described in the section ‘Assigning Eircodes’, only addresses listed in An Post’s GeoDirectory will be assigned Eircodes.

If an address has not been assigned an Eircode at launch, it is likely that the property will be assigned an Eircode when the Contractor receives updates of postal addresses every quarter. The Contractor will then assign Eircodes within one month of receiving a new address.

3.8 How Postal Addresses will be Managed

The Contractor **must not** change address information supplied in the source data. The Contractor is authorised solely to assign the Eircode, and to conduct legitimate, Eircode-related services.

3.9 Managing Eircode Changes

Once an address is assigned an Eircode, the Eircode will not normally change. However, if you believe there is a mistake with an Eircode, you can complain to the Eircode Contractor, under the 2015 Postal Services legislation. If we receive a valid complaint, we will liaise with the various stakeholder organisations to try to find a constructive solution.

The Contractor will register and investigate valid complaints.

When making a complaint, you can use the web form or email address on <http://www.eircode.ie> or you can call the Eircode Contractor’s contact centre at **0818 300 005** and an agent can explain to you how to make a complaint.

We may need to get your personal contact details in order to keep you informed of the outcome of the investigation. The data you provide may be processed and shared with other stakeholders for that purpose only.

The following section tells you about the enforcement powers of the Contractor.

3.9.1 Eircode Change Policy

Routing Key information (the first three digits of the Eircode) is based on address data provided to the Contractor using the source data. The Contractor has no authority to change the postal address information or the Principal Post Town to which a property is currently assigned.

It is the Contractor’s policy not to change an Eircode based solely on personal preference.

In exceptional circumstances, the Contractor may agree to replace an existing Eircode. However, the Contractor will first assess if such a change is reasonable or not.



If a request is acceptable, then you will be told and you will receive a new Eircode.

If a change request is unreasonable, you will be informed of the decision not to change, and your Eircode will remain as is.

The table below summarises when a change will and will not be considered:

A change will be considered when:	A change will not be considered when:
You can show that your Eircode could be interpreted as offensive.	The routing key is in the correct Principal Post Town even if this is different to the local interpretation of the area.
A single-unit address has changed to a multi-unit address in the source data.	The address information used by any other public or private agency (excluding An Post GeoDirectory) is used as the basis for a proposed change to an Eircode
An Eircode is a duplicate of another Eircode.	Properties are being marketed or promoted as being in a different geographical area to that defined by the postal address.
An assigned Eircode is consistently misinterpreted and you can prove this.	

3.9.2 Changes required by the Eircode Contractor

The Contractor does not expect that it will have to ask you to change an existing Eircode. However, if it is necessary to do this, the Contractor will inform you. The following steps outline the Contractor's procedure if they have to ask you to change an existing Eircode:

1. **Before a change is made**, the Eircode Contractor will write to the occupants of all addresses affected by the change telling them about the date of the change and inviting their views. (While the Contractor will consider all views received, they may not reply in writing to each household or person.)
2. **Once a change is made**, the Eircode Contractor will write to the occupants of affected addresses confirming details of their new Eircodes.
3. The Contractor will **make sure** that mail with the old **or** the revised Eircode details receives the same quality of service for a reasonable amount of time after the change.

Where a change is planned but won't happen for another three months, the Eircode Contractor will tell occupants of the property in question. This will give them time to implement the Eircode changes. This will also give them a chance to update forms, vehicle livery, signage, websites, as well as passing on their new details to relevant people and organisations.

3.9.3 The Eircode Contractor and Postal Address Changes

The Contractor cannot assign or change a postal address. An Post is responsible for the allocation and management of postal addresses in Ireland. Contact details for An Post and An Post GeoDirectory are in Section 7 (below).

3.9.4 Eircode Complaint Process

A formal, transparent and fair complaints procedure is an integral part of any professional service. If you have a complaint, you can write to the Eircode Contractor. By law, unless a complaint is determined to be 'trivial, vexatious, frivolous or not made in good faith', the Eircode Contractor must investigate it.

Section 6 of this Code of Practice (below) tells you how to register a complaint, and outlines how complaints are managed. The Eircode Contractor will initiate formal steps outlined as part of the Complaints process in order to investigate any complaint and to arrive at a fair outcome. By complaining, you authorise an agent of the Contractor to contact you about your complaint.

The agents of the Contractor will process any personal data gathered in the course of managing the complaints procedure. They will do this in line with the Irish Data Protection Acts 1988 - 2003, and will not disclose this information to third parties, unless they have your prior consent, or where they are required to do so by law.

The Contractor recognises that you have the right to:

- ◆ be treated with courtesy and respect;
- ◆ have clear concise information made available to you;
- ◆ understand the process of how a decision about to a complaint was made;
- ◆ have Eircode services delivered to agreed standards;
- ◆ be told about the Contractor's obligations;
- ◆ have your confidentiality and privacy respected and protected, in line with the Irish Data Protection legislation;
- ◆ be confident that your complaint will be dealt with in a timely and fair manner.

4 Service Standards

4.1 Service Standards

The Contractor and the Department of Communications, Energy and Natural Resources want to provide a first-rate, accurate and regularly updated National Postcode System. This will include issuing Eircodes to the public and also managing complaints. The Contractor aspires to working with organisations in both the public and private sectors to integrate the use of Eircodes into their day-to-day operations.

Under the terms of the Communications Regulation (Postal Services) (Amendment) Act, 2015, periodic reviews will be conducted of the Contractor's operations and services.

4.2 The Contractor's Commitment

The Contractor constantly seeks to improve its services and business standards. From time to time, the Contractor will want to improve its existing service product and to introduce necessary or desired services. It may be necessary to make changes to processes or systems to facilitate these improvements.

The Contractor will implement these improvements with minimal disruption to its Eircode Providers (EPs), Direct End Users and to the public.

5 Data Protection Policy

5.1 Confidentiality and Privacy

The Eircode Contractor respects the confidentiality and privacy of its staff, its EPs, and the general public. The Contractor will protect any personal information you provide if registering a complaint or making an enquiry. They will do this in line with the Contractor's Privacy Policy (see the Eircode website for this policy) and the Irish Data Protection legislation.

Personal data is collected if a member of public contacts the Contractor directly about an issue or has a complaint. This helps the Contractor to contact you back once this issue or complaint has been investigated and resolved.

Please note that personal data, in the form of IP addresses, may be captured in the course of monitoring and tracking usage of the Contractor's website.

The Contractor will adhere to the Irish Data Protection legislation when processing personal data. The Contractor affirms that at no time will it disclose (share) personal information to any third party organisations or persons without consent of the party providing the information, or unless required to do so by law. The Contractor's staff receive training on the appropriate responses to data sharing requests.

Where a third party may have a legitimate reason to request the personal data held by the Contractor, these requests are sent to the **Contractor's Operations Director**. The Operations Director will review the request and will direct staff on an appropriate response.

Where the Eircode Contractor does retain information, it follows the eight rules of data protection. They:

- ◆ only obtain and process the information fairly;
- ◆ only keep it only for one or more specified and lawful purposes;
- ◆ process it only in ways compatible with the purposes for which it was given initially;
- ◆ keep it safe and secure;
- ◆ keep it accurate and up-to-date;
- ◆ ensure that the processing of the data is adequate, relevant and not excessive;
- ◆ retain it no longer than is necessary for the specified purpose or purposes;
- ◆ give a copy of your personal data to you, on request.

5.2 Data Security

All data stored electronically on the Contractor's systems for Eircode business will be protected by state-of-the-industry encryption. Manual data held at the Eircode Contractor's offices will be stored securely in line with the law.

The Contractor tracks use of its online services. This means that they can detect and flag threats to the security or integrity of the Eircode database. In turn, this will help them to contain any attempted breach or theft of data.

If the integrity of its data security were to be breached, the Contractor will follow its Internal Data Security and Breach Notification procedures and responses.

The Contractor would adhere to its policies regarding Network Usage and Records Management. This includes procedures and protocols in terms of:

- ◆ the control of access to the data,
- ◆ acceptable use of the data,
- ◆ the criteria under which the Breach Notification and Disaster Recovery procedures will be used, and
- ◆ audit logs of what data has been accessed and who has accessed them.

The Contractor complies with the legal data management and security provisions. Any breaches of data security will be reported to the Contractor's Data Protection Officer in line with the Data Protection legislation, and as required under the Postal Services Amendment Act 2015.

A data breach occurs when:

- ◆ personal information is lost;
- ◆ there has been inappropriate access to personal information on the Contractor's systems, or
- ◆ when personal data was sent to the wrong individuals.

If a data breach is discovered, the Contractor will follow relevant policies. The Contractor will always inform the Department of Communications, Energy and Natural Resources and the Office of the Data Protection Commissioner of a breach. They will do so in a timely manner and will work with them to help to prevent further breaches.

If the Contractor's data systems deteriorate, are disrupted or stop working due to events beyond the Contractor's control – such as extremes of weather or social unrest – the Contractor will follow its Business Continuity Service Plan. This may involve emergency contingency, relocation, changes to management structures and other appropriate procedures and responses.

5.3 Acquiring and Processing Data

In general, the Contractor's policy for its agents does not ask for personal details. If you have received something with your personal details on it, you should contact the organisation that sent it to you to with a general query.

To resolve complaints or to process queries, a Contractor agent may ask you to provide your personal contact details. This information will only be used to contact you about your complaint or query. This information will only be recorded with your consent, and the EPs will store it in line with the Data Protection Acts 1988 – 2003.

The Eircode Contractor is **normally not allowed to disclose, share, transfer or otherwise provide personal information** to any third parties. However, there are exceptions – these are defined in Section 8 of Data Protection Acts 1988-2003. For example, where the Contractor has your permission to share or transfer your information for the purposes of resolving a complaint which you have raised, or is legally obliged to do so.

The personal information referred to here is limited to any personal data that may be supplied by you so that the Contractor can process your query or complaint. This data will never be associated with or stored on the Eircode databases.

If you provide personal information to the Eircode Contractor, or to any Data Controller, you have rights under the Irish Data Protection legislation.

These include:

- ◆ Right of Access
- ◆ correction of incorrect data
- ◆ support from the Office of the Data Protection Commissioner

5.3.1 Right of Access

In response to a written request from you, referencing Section 4 of the Irish Data Protection Act, the Contractor will provide you with a copy of any personal data that it holds about you.

Your request should be in writing, and should be sent to:

**Eircode, Data Protection Officer,
Block C, Maynooth Business Campus,
Maynooth,
Co. Kildare,
W23 F854**

or submit an email to hello@eircode.ie.

In your request, you should include sufficient information to allow the Contractor to identify your personal data (name, postal address, Eircode, and so on). The Eircode Contractor may charge an administrative fee in order to process your personal data request. The fee **will not be more than €6.35**.

Once the valid request has been received, the Eircode Contractor will respond as quickly as possible, but certainly within 40 calendar days from receipt of the request. If no personal data referring to you is held by the Eircode Contractor, you will be informed of this.

5.3.2 Correction of Incorrect Personal Data

If the Eircode Contractor holds personal data about you that is incorrect, you can ask that it be removed from, updated, or amended in, the Eircode Contractor's data records.

In the unlikely event that the error relates to the Eircode itself, the Eircode Contractor will work as quickly as possible to rectify the issue.

Where an error is detected which derives from the source data, the Eircode Contractor will liaise with the provider of the source data to ensure that the error is corrected or removed. This may take somewhat longer to resolve.

All personal data collected relating to the resolution of complaints will be managed in compliance with the Complaints Process outlined in Section 6 below, and will be stored subject to the Contractor's Data Retention Policy (see Section 6.5).

5.3.3 Support for your Concerns

If you are concerned about the use of an Eircode, you should contact the Eircode Contractor, in the first instance, by post at:

**Eircode,
Block C,
Maynooth Business Campus,
Maynooth,
Co. Kildare,
W23 F854**

by emailing **hello@eircode.ie**, or by calling **0818 300 005**.

The Eircode Contractor will investigate valid concerns, and will work with the various stakeholders to resolve any issues in a satisfactory manner.

If you are still concerned about the manner in which your personal data is being managed, you can bring your complaint to the Office of the Irish Data Protection Commissioner at Station Road, Portllington, Co. Laois, or email: info@dataprotection.ie.

5.4 Legitimate Eircode Services

The Eircode database does not contain personal data. The Eircode database can be bought as set out in the 'Business' section of the Eircode website, and as permitted in the course of legitimate, Eircode-related business.

The Postal Services Amendment Act 2015 identifies legitimate services in relation to the Eircode as follows:

- ◆ the association of geo-coordinates with the Eircode;
- ◆ the issuing of Eircode data to its corresponding postal addresses;
- ◆ the matching of a postal address with an Eircode (as long as such matching does not include personal data or individual identifiers);
- ◆ the development of the Eircode database to include other information about the postal address;
- ◆ the creation of a database containing Eircode data along with other, related information, for example, where an Eircode Provider appends the Eircode data to an existing database of client information;
- ◆ the licensing of appropriately qualified service providers to act as Eircode Providers;
- ◆ the supply of additional services in relation to the Eircode.

The Eircode Contractor has published an Acceptable Use Policy for service users in consultation with the Department of Communications, Energy and Natural Resources. The primary purpose of this Policy is to inform members of the public regarding the appropriate uses of the Eircode.

The Policy also serves as a guide for EPs in designing and delivering Eircode-related services using the data from the Eircode Contractor, in order to ensure that such services comply with the Irish Data Protection and Postal Services legislation.

EPs and End Users often disclose the Eircode to other organisations, including to organisations established outside of the European Economic Area. Such disclosure must be done under the controls and provisions of a data management contract, and should set clear expectations about the acceptable and lawful use of the Eircode data.

The Eircode Contractor will publish on its website a Directory of EPs who are licensed by the Contractor to provide Eircode services. This is to provide transparency to the public regarding who has licensed use of the Eircode database.

The Contractor will audit these Eircode services regularly to ensure that the EPs meet their obligations. The Contractor is authorised to revoke, suspend or terminate an EP licence for substantial or persistent non-compliance.

These obligations are set out in the terms of the EP Licence Agreement. They will be communicated clearly to any organisation applying to receive a EP licence.

An audit of an EP or End-User could start due to:

- ◆ incompetence in managing and processing the Eircode data;
- ◆ a high volume of complaints from users about data received from or processed by EPs;
- ◆ late or inaccurate monthly reports on Eircode usage;
- ◆ a regular schedule of EP monitoring.

5.5 Privacy Notice on Websites

Under the provisions of the Postal Services Amendment Act 2015, both the Eircode Contractor and licensed EPs must publish a Privacy Notice on their respective websites. This Notice will include the following:

- ◆ an explanation of the background and context of the Eircode;
- ◆ a description of the sources of the Eircode data;
- ◆ an explanation of the sources of additional data they hold, especially where this includes personal data which identifies an individual (included in EPs' reports);
- ◆ information on the availability of a public register of licenced EPs (include this in the Contractor's report);
- ◆ information for you about your right to have incorrect data about you corrected or removed;
- ◆ information about your right to register valid complaints about Eircode services with the Contractor.

5.6 Retention and Destruction Policies

Personal information received by the Contractor will only be used for that purpose, and will only be retained for as long as necessary to satisfy the Contractor's legal and regulatory obligations. Such data will be subject to the Eircode Contractor's Data Retention and Destruction policies.

It is not the Contractor's intention to collect and store data for any purpose other than the legitimate purposes stated above.

5.7 Privacy Policy

The Eircode Contractor will take every care to protect your privacy and the privacy of other users of its services. The following principles form the key elements of the Contractor's Privacy Policy, which is available on the Contractor's web-site.

The Eircode Contractor is subject to legislation regarding privacy and confidentiality, including the Irish Data Protection Acts 1988 and 2003. Any dispute or claims for breach of privacy are subject to the jurisdiction of the Irish courts.



- ◆ Any data file or record that contains personal data will be treated as confidential.
- ◆ In your written dealings with the Eircode Contractor, you may need to share personal information to the Eircode Contractor. The treatment of any personal information which the Eircode Contractor may collect during the normal course of business is subject to the provisions of the Irish Data Protection Acts.
- ◆ The Eircode Contractor will not store personally identifiable data for any longer than is necessary.
- ◆ The Eircode Contractor will not disclose or share your personal information with any third party outside of Contractor's own organisation **without your prior consent, unless** they have to so by law.
- ◆ Personal data you supply as part of an application, or as part of a request or enquiry you have made, will be only passed to the relevant business unit within the Eircode Contractor's organisation.
- ◆ You have a right to get a copy of personal data that the Eircode Contractor may hold about you.
- ◆ All Eircode Contractor staff take part in mandatory, annual training on their Data Protection obligations and Information Security Awareness.
- ◆ If you have submitted personal information through the Eircode Contractor's website, but wish to prevent or stop the Contractor from using the information for the purposes submitted, contact the Contractor by email at: **hello@eircode.ie**. Your email should state why you are concerned and provide sufficient information to help the Contractor respond to your request.

6 Complaint Process

Complaints are sometimes unavoidable, but when they do occur, the Contractor has an open, fair, and transparent process in place to manage and do their best to resolve them to your satisfaction where possible.

If you are making a complaint, please provide sufficient information to enable the Contractor to investigate it properly.

The following is a guide to the Contractor’s Complaints Management process. For reporting purposes, legitimate complaints submitted in writing to the Eircode Contractor will be categorised using the types listed below.

6.1 Types of Complaints

Complaint	Description
Call Centre Service	Complaints about the level of service being provided by the Contractor’s service centre.
Current Eircode	All complaints about Eircodes services.
Business Process	Complaints about existing Contractor business processes that are thought not to be working.
Postal Address*	Complaints related to the postal address cannot be addressed by the Contractor and will be referred to An Post.

* Please note that an address used in an Eircode notification letter telling the occupant of an Eircode, or an address supplied using the Eircode Finder, is the postal address supplied to the Contractor from the source data (see the Section 3.6: ‘Assigning an Eircode’).



6.2 How to make a Complaint

You can complain by phone, email, online or by post. Please see the details below for each of these options.

Complaint	Contact Details
Telephone	Telephone complaints can be made to the Eircode Contractor's Contact Centre using the following number: 0818 300 005
Email	Emailed complaints should be sent to the Contractor using the following details: <ul style="list-style-type: none">• Email address: hello@eircode.ie• Email Subject Line: Complaints
Website (Eircode.ie)	Complaints can be registered on the Eircode website.
Post	Postal complaints should be sent to: <ul style="list-style-type: none">• Complaints, Eircode, Block C, Maynooth Business Campus, Maynooth, Co Kildare, W23 F854.

6.3 How the Contractor will Manage and Respond to your Complaints

The Eircode Contractor will review all complaints to determine if they are vexatious, trivial, frivolous or not made in good faith.

If the Contractor decides that your complaint is genuine, it will try to resolve it as quickly as possible. Responses to complaints will vary depending on the nature and complexity of a complaint.

6.4 Complaint Management Report

By law, the Contractor must report annually to the Department of Communications, Energy and Natural Resources to provide information on how the Complaints Management process is working. At a minimum, this report should contain details on:

- ◆ the volume of complaints received;
- ◆ the range of complaints received (based on the categorisation above);
- ◆ the decisions reached after investigating complaints;
- ◆ decisions where the Contractor decided not to investigate a complaint;
- ◆ any other information that the Contractor considers appropriate.

6.5 Keeping Information about Complaints

It is the Contractor's policy to keep records relating to complaints for three months following resolution of the complaint. To identify complaint trends, the Contractor will retain certain elements of the complaint data, but will remove reference to personal identifying data. Trend analysis may not be possible if the data is deleted immediately after a complaint has been resolved. This policy will be reviewed annually.

6.6 Complaints about Direct Marketing

Adding an Eircode to an existing postal address should not change the current obligations on organisations in terms of direct marketing. Organisations must continue to comply with the relevant sections of the Data Protection legislation when conducting marketing campaigns.

If you receive unsolicited direct mail, you should contact the organisation who sent you the mail and tell them that you want to be removed from their marketing mailing list. The organisation then has 40 days to remove your address from their list.

If you continue to receive direct mail from this organisation, you can raise a complaint with the Office of the Irish Data Protection Commissioner (info@DataProtection.ie).

6.6.1 Eircode Contractor's role

Where the Eircode Contractor becomes aware that a licensed EP is facilitating the distribution of unsolicited direct marketing campaigns, it will make every effort to address this with the EP, and to make sure that the activity stops. Persistent non-compliance will be reported to the Office of the Data Protection Commissioner.

6.6.2 Mail Preference Service

The Mailing Preference Service (MPS) is a free service set up and funded by the Irish Direct Marketing industry to:

- ◆ help consumers to have their names and addresses removed from mailing lists;
- ◆ allay any fears and misapprehensions about direct mail;
- ◆ promote good practice within the direct marketing industry.

The Mailing Preference Service exists to make sure that the people receiving direct mail are the intended recipients.

What does the MPS stop?

Registering with MPS will stop most personally addressed, unsolicited mail which is delivered to your home. Personalised mail from companies with which consumers have done business in the past are not restricted by the MPS. If the consumer no longer wants to receive this mail, they can opt out by contacting the individual company directly.

The MPS cannot stop:

- ◆ unaddressed leaflets;
- ◆ non-personalised items addressed to 'The Occupier', and so on.;
- ◆ free newspapers;
- ◆ inserts in bills and magazines;
- ◆ personalised mailings from abroad.

You can find more information about the MPS and the MPS application form at www.idma.ie/what-is-mps/.

7 Useful Contacts

Organisation	Contact Details
An Post	<p>An Post General Post Office O'Connell Street Lower Dublin 1 D01 F5P2</p> <p>Web: http://www.anpost.ie/AnPost/MainContent/Customer+Service/</p>
An Post GeoDirectory	<p>An Post GeoDirectory General Post Office O'Connell Street Lower Dublin 1 D01 F5P2</p> <p>Web: https://www.geodirectory.ie</p>
Commission for Communications Regulation (ComReg)	<p>Commission for Communications Regulation (ComReg) Abbey Court Irish Life Centre Lower Abbey Street Dublin 1 D01 W2H4</p> <p>Web: http://www.comreg.ie/contact_us/comreg_contact_details.141.contact.html</p>
The Contractor / Eircode	<p>The Contractor / Eircode Block C Maynooth Business Campus Maynooth Co Kildare W23 F854</p> <p>Web: http://www.eircode.ie/</p>
The Interactive Direct Marketing Association (IDMA)	<p>IDMA Fitzwilliam Street Upper Dublin D02 E033</p> <p>Web: http://idma.ie/</p>
Office of the Information Commissioner	<p>Office of the Information Commissioner 18 Lower Leeson Street Dublin 2 D02 HE97</p> <p>Web: http://www.oic.gov.ie/en/</p>



Office of the Data Protection Commissioner	Office of the Irish Data Protection Commissioner Station Road Portarlinton Co. Laois R32 AP23 Web: www.dataprotection.ie/
The Minister for Communications, Energy and Natural Resources	The Department of Communications, Energy and Natural Resources 29-31 Adelaide Road Dublin 2 D02 X285 Web: http://www.dcenr.gov.ie/en-ie/about-us/contact-us/Pages/home.aspx

Copyright Information

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8 Appendix A - Acceptable Use Policy

This Acceptable Use Policy sets out the terms between you and Capita Business Support Services Ireland Limited under which you may access our website, www.eircode.ie (the “**Website**”) and use the national postcode database, EIRCODE® Database.

This Acceptable Use Policy applies to all users of, and visitors to, the Website and users of the EIRCODE® Database (including without limitation EPs and End Users, as defined below).

Use of the Website and EIRCODE® Database means that you accept, and agree to abide by, this Acceptable Use Policy, as well as the Website’s Terms of Use, www.eircode.ie/legal and the Code of Practice www.eircode.ie/code-of-practice

The Website is operated by Capita Business Support Services Ireland Limited (“we” or “us”). We are registered in Ireland under company number 395165 and we have our registered office at 2 Grand Canal Square, Grand Canal Harbour, Dublin 2. Our main trading address is Block C, Maynooth Business Campus, Maynooth, Co Kildare, W23 F854. Our VAT number is IE6415165A.

1. Purpose

The purpose of this policy is to (i) set out the terms on which you may access the Website and (ii) explain the range of ways in which the national postcode database, (hereinafter the “EIRCODE® Database”) can be used by licensed Eircode Providers (EPs) and End Users as well as the general public.

Eircode Providers are organisations which offer value added services relating to the EIRCODE® Database to companies and End Users.

End Users are organisations and individuals who use the EIRCODE® Database themselves, with or without the intervention or involvement of Eircode Providers.

As the organisation with responsibility for the development, implementation, deployment, management and operation of the EIRCODE® Database, Capita Business Support Services Ireland Limited (the Eircode Contractor) will monitor the activities and usage of the EIRCODE® Database by the licenced EPs and End Users as well as by the general public.

This policy also seeks to protect the integrity and objectives of the EIRCODE® Database, providing a unique EIRCODE® for addresses within Ireland.

Inappropriate use of the EIRCODE® Database may expose householders and individuals to unlawful or inappropriate use of their personal data, and/or may lead to intrusion into their personal lives and correspondence.

It is the policy of the Eircode Contractor that the EIRCODE® Database and its associated products and services should be offered in a manner that is open, transparent and compliant with all relevant laws, standards and regulations.

2. Scope

This policy applies to the use of (i) the Website and (ii) the 7-digit EIRCODE® issued to each property in Ireland.

The EIRCODE® can be used by individual householders as a unique identifier for their domestic property as well as to identify business and commercial properties. Over 2.2 million Irish properties will have an assigned EIRCODE®.

Commercial organisations (namely, EPs) will be licenced to offer data management services using the EIRCODE® Database, and this Policy, the Code of Practice as well as the Licence Agreement entered into with the Eircode Contractor will govern their use of the EIRCODE® Database as they offer their value-added services.

The EPs, End Users and users of the Website and/or EIRCODE® Database are responsible for exercising good judgment regarding appropriate use of the Website and/or EIRCODE® and must comply with the Eircode Contractor's policies, codes of practices and standards, the Website Terms of Use, Licence Agreements (where applicable) and with all local laws and Regulations.

This includes the provisions of the Communications (Postal Services) (Amendment) Act, 2015, and the Irish Data Protection Acts 1988 and 2003.

3. Acceptable Use

3.1. General Use of the Website, EIRCODE® and EIRCODE® Database

- 3.1.1. The Website and EIRCODE® Database and all intellectual property rights associated with them, will remain the exclusive property of the Eircode Contractor and its licensors. Individuals and organisations must be authorised to use the EIRCODE® Database but must do so in a lawful manner.



3.1.2. Members of the public are encouraged to use the EIRCODE®, in addition to their address, to aid postal, location and similar services to be delivered more effectively and efficiently. They can search for EIRCODES® online on the Website using the “Eircode Finder”. By using the EIRCODE® Database on the Website, this means that you accept and agree to abide by this Acceptable Use Policy as well as the Website’s Terms of Use www.eircode.ie/legal and Code of Practice www.eircode.ie/code-of-practice. If you do not agree to this, please do not use the Website or the EIRCODE® Database.

An Eircode Finder facility is provided by the Eircode Contractor as a free of charge facility for finding the EIRCODES® relevant to a property – this will be limited to 15 searches of the Eircode Finder facility per day. Users exceeding this number of searches in a 24-hour period will be identified, and their access to the EIRCODE® Database will be curtailed. All such use must be in accordance with this Policy, our Terms of Use www.eircode.ie/legal and the Code of Practice www.eircode.ie/code-of-practice.

An extensive set of **Frequently Asked Questions (FAQ’s)** and their respective answers is provided on the Website by the Eircode Contractor in order to explain the format, structure and variety of uses of EIRCODES® and the EIRCODE® Database.

3.1.3. Eircode Providers (EPs) and End Users are authorised to use the EIRCODE® Database within the terms set out in the Licence Agreement, issued by the Eircode Contractor. By signing the Licence Agreement, EPs and End Users agree to abide not only to the terms of that Agreement but also to the terms of this Acceptable Use Policy as well as the Code of Practice.

A **Code of Practice** is provided by the Eircode Contractor, and published on the Website www.eircode.ie/code-of-practice setting reasonable expectations regarding the acceptable use of EIRCODES® and the EIRCODE® Database.

4. Legislation

Under the Communications (Postal Services) (Amendment) Act 2015, the following activities are considered to be acceptable uses of the EIRCODE® and the EIRCODE® Database:

- ♦ the use of the EIRCODE® as a unique identifier of a domestic, commercial or municipal property;
- ♦ the matching of a postal address to an EIRCODE®;
- ♦ the enhancement of the EIRCODE® Database to include other information in relation to the postal address;
- ♦ the creation or management of an EIRCODE® database by the Eircode Contractor or EP;
- ♦ the licencing of appropriately-qualified service providers to act as Eircode Providers;
- ♦ the supply of value added services by Eircode Providers in relation to the EIRCODE® Database.

4.1. Data Protection

The EPs and End Users must ensure that their processing and use of the personal data associated with the EIRCODE® Database will comply with the provisions and rules of the Irish Data Protection legislation, namely:

- ♦ that the processing should be fair, lawful, open and transparent with regard to the personal data of living individuals;
- ♦ that the processing should only be for one or more lawful and specified purposes;
- ♦ that any use or service offered should be compatible with these specified purposes;
- ♦ that any personal data should be kept safe and secure from unlawful or unauthorised access or modification;
- ♦ that the personal data should be kept as accurate and up-to-date as possible;
- ♦ that any processing or disclosure of the personal data should be adequate, relevant and not excessive;
- ♦ that the personal data should not be held by the EP or the End User for longer than necessary for the purpose of providing the relevant services.

The EP and End Users must also comply with the other provisions of the Data Protection legislation, including access, erasure and blocking of personal data.

Any processing of the EIRCODE® as well as use of the EIRCODE® Database should be compliant with all relevant laws and provisions.



4.2. Unacceptable Use of the EIRCODE® Database

The following uses of EIRCODES® and the EIRCODE® Database are, in general, prohibited;

- ♦ any illegal or immoral use;
- ♦ any use which would contravene the provisions of the Irish Data Protection Acts 1988 and 2003;
- ♦ any use which would be contrary to the terms of the Licence Agreements;
- ♦ any service which is not considered a legitimate postcode activity under the Communications (Postal Services) (Amendment) Act 2015;
- ♦ any use or service that would bring the EIRCODE® brand as well as the Eircode Contractor into disrepute;
- ♦ any use which would be contrary to this Policy or the Eircode Contractor's Code of Practice (including without limitation carrying out more than 15 searches in the Eircode Finder facility per day);
- ♦ breaches of any applicable local, national or international law or regulation.

4.3. Unacceptable Use of the Website

You may use the Website only for lawful purposes. You may not use the Website and agree not to:-

- ♦ upload, post, email, transmit or otherwise make available any content or initiate communications that infringes the intellectual property rights or any other rights of others;
- ♦ harvest or otherwise collect or use information about others without their explicit consent;
- ♦ upload, post, email, transmit or otherwise make available any unsolicited or unauthorized advertising, promotional materials, "junk mail," "spam," "chain letters," "pyramid schemes," or any other form of solicitation;
- ♦ upload, post, email, transmit or otherwise make available any material that contains software viruses or any other computer code, files or programs designed to interrupt, destroy or limit the functionality of any computer software or hardware or telecommunications equipment;
- ♦ interfere with or disrupt the site or servers or networks connected to the Website, or disobey any requirements, procedures, policies or regulations of networks connected to the Website;
- ♦ after receiving a warning, continue to disrupt the normal flow of dialogue, or post comments that are not related to the topic being discussed;
- ♦ impersonate another person;



- ♦ engage in any other conduct that restricts or inhibits any other person from using or enjoying our site, or which, in our judgment, exposes us to any liability or detriment of any type;
- ♦ act in any way that breaches any applicable local, national or international law or regulation;
- ♦ act in any way that is unlawful or fraudulent, or has any unlawful or fraudulent purpose or effect.

4.4. Breach of this Policy

The Eircode Contractor will determine, at its discretion, whether there has been a breach of this Acceptable Use Policy through your use of the Website and/or the EIRCODE® Database. When a breach of this Policy is deemed to have occurred, the Eircode Contractor may take such action as it deems appropriate.

Failure by you to comply with this Acceptable Use Policy and may result in the EP Contractor taking all or any of the following actions:

- ♦ immediate, temporary or permanent withdrawal of your right to use the Website and/or the EIRCODE® Database;
- ♦ immediate, temporary or permanent removal of any posting or material uploaded by you to the Website;
- ♦ issuance of a warning to you;
- ♦ legal proceedings against you for reimbursement of all costs on an indemnity basis (including, but not limited to, reasonable administrative and legal costs) resulting from the breach;
- ♦ further legal action against you;
- ♦ disclosure of such information to law enforcement authorities, as the Eircode Contractor reasonably feels is necessary.

The Eircode Contractor excludes liability for actions taken in response to breaches of this Acceptable Use Policy. The responses described in this Policy are not limited, and the Eircode Contractor may take any other action it reasonably deems appropriate (including any remedies or actions available to it under the Licence Agreements).

4.5. Governance

The Eircode Contractor will conduct regular audits to ensure that the EPs and End Users meet these obligations.

4.6. Changes to the Acceptable Use Policy

The Eircode Contractor may revise this Acceptable Use Policy at any time by amending this page. You are expected to check this page from time to time to take notice of any changes the Eircode Contractor makes, as they are legally binding on you. Some of the provisions contained in this Acceptable Use Policy may also be superseded by provisions or notices published elsewhere on the Website.

5. Related Legislation, Policies and Processes

- ◆ Privacy Policy
- ◆ Privacy Statement
- ◆ Licence Agreements
- ◆ Code of Practice
- ◆ Terms of Use
- ◆ Communications (Postal Services) (Amendment) Act 2015
- ◆ Data Protection Acts 1988 and 2003