ISI
Seirbhís Déantóireachta na hÉireann
Insolvency Service of Ireland

Privacy Notice



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Revision History

Version	Date	Revision Author	Approved by
2	30/10/2025	Trevor Noonan	Approved at SMT 22/10/2026

1. Privacy Notice

The Insolvency Service of Ireland ("**ISI**", "**us**", "**we**" or "**our**") is an independent statutory body established under the Personal Insolvency Act 2012 (as amended) (the "**Act**").

This Privacy Notice sets out the basis on which any personal data we collect about you or that you provide to us will be processed by us as data controller. It should be read in conjunction with our Cookie Policy. It also outlines your rights in relation to your personal data. Please read this Privacy Notice carefully to understand our treatment and use of your personal data as a data controller and how we will use, store and disclose it.

2. Processing Your Data

The Insolvency Service of Ireland (the ISI) collects, processes and stores significant volumes Personal data means information that identifies you or could identify you. It does not include data where the identity has been removed (i.e. anonymous data). In order to provide our services, and in order to comply with our legal obligations, we require certain personal data.

If you do not provide us with your personal data we may not be able to provide you with our services including access to parts of our website (the "**Site"**) or respond to your questions or requests. We will tell you when we ask for personal data which is a contractual requirement, is needed to perform our regulatory and supervisory functions, or required for us to comply with our legal obligations.

2.1 Where do we collect this personal data?

Most of the personal data we process is obtained from you when you provide it directly to us e.g. when you fill out a form, register as a user on the Site, or send us an email. We may also obtain your personal data from other sources in the course of the performance of our statutory functions and activities. These sources include government departments (e.g. the Department of Employment Affairs and Social Protection Department of Social Protection), the Revenue Commissioners, local authorities and other state bodies or agencies, creditors, debtors and other third parties in connection with your insolvency arrangements. The personal data gathered or obtained may include details we consider necessary to verify the

completeness or accuracy of any matter we are reviewing, processing or administering under our statutory functions including financial details, property ownership and business relations. Please see Annex 1 for further details on indirect sources of your personal data that we process in the course of the performance of our statutory functions and activities.

We may collect and process your personal data when you visit the Site. This may include traffic data, location data, weblogs and other communication data. For more information on how we collect such personal data please see our Cookie Policy. We may also record the time and date of your visit to our premises.

2.2 Sending personal data outside the European Union (EU) or European Economic Area (EEA)

Your personal data may be stored and transferred within the European Economic Area ("**EEA**") or transferred to, and stored in, countries outside the EEA. Those countries may not provide an adequate level of protection in relation to processing your personal data. Your personal data may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Where it is necessary to transfer personal data outside of the EEA, we will ensure appropriate safeguards are in place to protect the privacy and integrity of such personal data, including standard contractual clauses under GDPR Article 46.2 or adequacy decisions under GDPR Article 45. Please contact us if you wish to obtain information concerning such safeguards (see **Contact Us** below).

2.3 Security

The Insolvency Service of Ireland (the ISI) collects, processes and stores significant volumes. We are committed to protecting the security of your personal data. We will take all reasonable steps necessary to ensure that your personal data is treated securely and in accordance with this Privacy Notice. We use a variety of security technologies and procedures to help protect your personal data from unauthorised access and use. As effective as modern security practices are, no physical or electronic security system is entirely secure. The transmission of information via the internet or email is not completely secure.

Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our Site or our email addresses. Any transmission of

personal data is at your own risk. Once we receive your personal data, we will use appropriate security measures to seek to prevent unauthorised access. We will continue to revise policies and implement additional security features as new technologies come available. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site, you are responsible for keeping that password confidential and secure. We ask you not to share your password with anyone.

2.4 Why do we collect your personal data?

We will hold, process and may disclose personal data for the following purposes:

Purpose(s) for processing	Legal basis for processing
• To carry out our duties and exercise our powers assigned to us by the Act including the administration of debt relief procedures under the Act (Debt Relief Notice, Debt Settlement Arrangement and Personal Insolvency Arrangement), the supervision and regulation of authorised intermediaries and personal insolvency practitioners, the establishment and maintenance of a number of public registers and the administration of the functions assigned to the Official Assignee and his Office under the Bankruptcy Act 1988 • To share information with government departments, the Revenue Commissioners, local authorities and other state bodies or agencies	The processing is necessary for the performance of a task carried out in the public interest or in the exercise of an official authority vested in us
• To carry out our obligations and/or rights arising from any contracts entered into between you and us • To notify you about changes to our Site • To improve our services and activities • To process job applications	The processing is necessary to perform a contract or enter into a contract with you

Purpose(s) for processing	Legal basis for processing
• To anonymise your information so that you are no longer identifiable to us	The processing is necessary to support our legitimate interests in managing our organisation (to ensure data minimisation) provided such interests are not overridden by your interests and rights. The processing is necessary for us to comply with legal and regulatory obligations.
• To comply with our regulatory (for example disclosing tax data to the Revenue Commissioners) and professional requirements • To prevent and detect fraud, money laundering or other offences • To exercise our right to defend, respond or conduct legal proceedings	The processing is necessary for us to comply with legal and regulatory obligations.
• To send you email alerts and newsletters that you have opted-in to receive and/or other direct marketing	• Where you have given consent to the processing of your personal data for direct marketing – which you may withdraw at any time. • Where your consent is not required and you have not objected, the use of the data is necessary for our legitimate interest in managing our organisation including legal, personnel, administrative and management purposes provided our interests are not overridden by your interests.

2.5 Special Categories of personal data

Certain categories of personal data are regarded as "special" including health data (both physical and mental), political opinions, biometric and genetic data, trade union membership, ethnic or racial origin and sexual orientation. We process your special personal data only where we have a legal basis e.g. with your explicit consent which you may withdraw at any

time, where you have made such special data manifestly public or where such processing is necessary for reasons of substantial public interest on the basis of and in compliance with Irish and/or EU law.

2.6 Who do we share your personal data with?

In order to provide you with our services, carry out our activities and to comply with legal obligations, we may share your personal data with certain third parties such as:

- service providers, agents and advisors appointed by us;
- analytics and search engine providers who assist us in the improvement and optimisation of the Site;
- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- creditors and debtors, or other third parties, involved in your personal insolvency or bankruptcy arrangements;
- An Gardaí Síochána, local authorities, the Revenue Commissioners, the courts and any other central or local government bodies where they request it and we may lawfully disclose it, for example for the prevention and detection of crime or in the performance of a task carried out in the public interest or in the exercise of an official authority vested in us; and
- others who work for us in connection with the provision of products and/or services to you.

2.7 How long do we retain your personal data for?

We will only store your personal data for as long as necessary for the purpose(s) for which it was obtained. The criteria used to determine our retention periods include (i) the length of time we provide our services or maintain a relationship with you; (ii) where we are subject to a legal requirement; and (iii) whether the retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

2.8 Links to other sites

Our Site may, from time to time, contain links to and from other websites and web platforms. If you follow a link to any of those websites or web platforms, please note that those websites and web platforms have their own privacy policies and that we do not accept any responsibility or liability for those policies. Please check those policies before you submit any personal data to those websites.

3. Your Rights

You have several rights in relation to your personal data, which may be subject to certain limitations and restrictions including those relating to the right of access as set out in section 186 of the Act and section 140D of the Bankruptcy Act 1988 (as amended). These rights are to:

- access a copy of the personal data we hold about you;
- have us correct any inaccurate personal data about you and complete any personal data that is incomplete;
- erasure of your personal data. Please note, this right does not apply, for example, where the processing is necessary to comply with a legal obligation or for the establishment, exercise or defence of legal claims;
- request a copy of your personal data in a portable format;
- request a restriction of the processing of your personal data;
- withdraw your consent. If we are processing your personal data on the legal basis of consent, you are entitled to withdraw your consent at any time. However, the withdrawal of your consent will not invalidate any processing we carried out prior to your withdrawal and based on your consent;
- not to be subjected to decisions based solely on automated processing, including profiling, which produce legal effects concerning you or similarly significantly affects you other than where the decision is:
    - necessary for entering into a contract, or for performing a contract with you;

- based on your explicit consent – which you may withdraw at any time; or
- is authorised by EU or Member State law.

- object to the processing of your personal data where we are processing your personal data in reliance on our legitimate interests, for the performance of a task carried out in the public interest or in the exercise of our official authority. In such a case we will stop processing your personal data unless we can demonstrate compelling legitimate grounds which override your interests and you have a right to request information on the balancing test we have carried out. You also have the right to object where we are processing your personal data for direct marketing purposes.

If you wish to exercise any of these rights, please contact us (see **Contact Us** below). We may request proof of identification to verify your request.

You also have the right to make a complaint to the Data Protection Authority, in particular in the Member State of your residence, place of work or place of an alleged infringement, if you consider that the processing of your personal data infringes the GDPR. The Irish personal Data Protection Authority contact details are:

Data Protection Commission

Telephone: +353 (0)761 104 800 or Lo Call Number 1890 252 231

E-mail: info@dataprotection.ie

For further information please visit www.dataprotection.ie

3.1 Access to information and correction

You may request copies of your personal data held by us as data controller. We will provide you with a copy of the personal data held by us as soon as practicable and in any event not more than one month after the request in writing is received by us. We will provide you with the copy free of charge but please note that we reserve the right to charge a reasonable administrative fee where further copies are requested or the request is manifestly unfounded or excessive. We may also request proof of identification to verify your access request. All access requests should be addressed to our Data Protection Officer (see **Contact Us** below).

We endeavor to keep your personal data accurate, complete and up to date. If your personal data that we hold is inaccurate, you can let us know and we will make the necessary amendments, erase or block the relevant personal data as you request and notify you without undue delay of your request (and in any event within one month unless extended in accordance with the GDPR) that relevant action has been taken. All requests should be addressed to our Data Protection Officer (see **Contact Us** below).

At any time you may object to the processing of your personal data by us, except when otherwise provided by applicable law, and may block specific uses of your personal data by contacting us using the contact details below.

4. Changes to our Privacy Notice

We reserve the right to change this Privacy Notice at any time in our sole discretion. If we make changes, we will post these changes here and update the "Last Updated" date at the bottom of this Privacy Notice. If at any time we decide to use personal data in a manner significantly different from that stated in this Privacy Notice, or otherwise disclosed to you at the time it was collected, we will notify you in writing, and you will have a choice as to whether or not we use your personal data in the new manner in accordance with your rights under data protection law.

5. Contact Us

Questions, comments and requests regarding this Privacy Notice and your personal data are welcome and should be addressed to the Data Protection Officer (**DPO**) at the below email and/or postal address:

DPO: Trevor Noonan

Email: dp@isi.gov.ie
Address: Insolvency Service of Ireland,
6th Floor Smithfield Hall,
Dublin 7, D07 AEF4

Last updated: 30 October 2025

Annex 1

Indirect Sources of Personal Data

Legal Basis	Purpose	Source
Carrying out our legal obligations and statutory functions under the Personal Insolvency Act 2012 (as amended)	Application for a Debt Relief Notice ("**DRN**")	• Debtor's approved intermediary • Creditors involved in the arrangement • Government departments, a local authority or any state body or agency • court
	Application for a Debt Settlement Arrangement or a Personal Insolvency Arrangement	• Debtor's personal insolvency practitioner • Government departments, the Revenue Commissioners, a local authority or any state body or agency • court
	Authorising approved intermediaries and personal insolvency practitioners	• The approved intermediary and personal insolvency practitioner • The ISI has the power to make such inquiries as the ISI considers necessary in relation to the character, competence and financial position of a PIP applicant
	Regulating and supervising approved intermediaries and personal insolvency practitioners	• Persons making complaints about personal insolvency practitioners

Legal Basis	Purpose	Source
Carrying out the Official Assignee's statutory functions under Bankruptcy Act 1988 (as amended)	To get in and realise the assets, ascertain the debts and liabilities of the Bankrupt and distribute dividents to creditors of the bankruptcy (in accordance with the provisions of the Bankruptcy Act 1988 (as amended)	• Creditors, third parties (including co-owners, tenants and others declared in the area of assets, liabilities and income and expenses), Government departments, the Revenue Commissioners and other government bodies and agencies with knowledge of the bankrupt's assets which have now vested in the Official Assignee and compose of a bankruptcy estate or may result in a material benefit to the bankruptcy estate.