



Comhairle Chontae na Gaillimhe Galway County Council

Privacy Notice – **WiFi4EU Free WiFi**

Galway County Council is the local authority for the County of Galway and in performing its functions, Galway County Council is required to process significant amounts of “Personal Data” within the meaning of the Data Protection Acts 1988 / 2003/2018 (“the Acts”) and the European regulations 2016/679 (GDPR). Galway County Council respects the privacy rights of those whose Personal Data we process and we are conscious of our obligations under the Data Protection Acts.

This Privacy Notice explains how Galway County Council will process Personal Data collected through the WiFi4EU Free WiFi Service available in County Galway. The WiFi4EU initiative promotes free access to WiFi connectivity for citizens in public spaces including parks, squares, public buildings, libraries, health centres and museums in municipalities throughout Europe. Under this initiative Galway County Council is providing a number of public WiFi networks for public use across County Galway. A list of locations can be found through the link below:

[Getting Online Map](#)

What type and how will your Personal Data be collected and processed?

Data collected will be in the form of MAC (Media Access Control) addresses or, depending on the user’s device settings, randomised MAC addresses of wi-fi enabled devices connected to the network. A MAC address is a hardware identification number that uniquely identifies each device on a network. A randomised MAC address is a random, anonymous device identifier generated by a user’s device and used instead of the device’s real MAC address when connecting to wireless networks. MAC addresses, or randomised MAC addresses if enabled by the user, are collected once a user connects their device to the WiFi network. The MAC addresses, or randomised MAC addresses, are then anonymised and no further processing of personal data takes place from this point. This data will be collected to enable the provision of the public WiFi network and for the generation of anonymised statistics on network usage.

What are our lawful bases for processing your Personal Data?

Galway County Council’s lawful basis for processing Personal Data collected from WiFi4EU Free WiFi Service is as follows:

- Article 6 – 1 (e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Data which is processed under the WiFi4EU Free WiFi Service is processed to enable the provision of the public WiFi network. Galway County Council is contractually bound to provide this WiFi service through an agreement with the Innovation and Networks Executive Agency under the powers delegated to it by the European Commission. This scheme is governed by [Regulation \(EU\) 2017/1953](#).

Who will your Personal Data be shared with?

Magnet Networks are the designated data processors for the service and will store the anonymised MAC addresses. Anonymised MAC address information will be held by Magnet Networks for a period of 12 months and anonymised data will be shared with Galway County Council and the European commission

for the purposes of providing analytics in relation to the WiFi network usage. Anonymous network usage statistics may also be shared with the public/chambers of commerce.

How will we protect your Personal Data?

MAC addresses, or randomised MAC addresses depending on the users' device settings, are collected once a user has enabled WiFi and selected to connect to the public WiFi network. The MAC addresses, or randomised MAC addresses, are then anonymised and no further processing of personal data takes place from this point. If you prefer that your device's MAC address be randomised before it is registered by the public WiFi network you can check if this feature is already enabled on your device's settings, or to turn on this setting please consult the manufacturers' guidelines for your device. Galway County Council accepts no liability for any damage or losses incurred by users of the public WiFi network as a result of any changes to device settings and recommends that any changes made should be in line with the devices manufacturers' recommendations.

How long will we hold your Personal Data?

Anonymised MAC address information will be held by Magnet Networks for a period of 12 months after which the data is terminated.

What are your rights?

For further information on how Galway County Council processes Personal Data and your rights, please refer to Galway County Council's Privacy Statement and Data Protection Policy which can be found on our website galway.ie.

OR

You may contact Galway County Council 's Data Protection Officer at 091 509290 or dpo@galwaycoco.ie

Right of Complaint to the Office of the Data Protection Commissioner

If you are not satisfied with the outcome of the response you received from Galway County Council in relation to your request, then you are entitled to make a complaint to the Data Protection Commissioner who may investigate the matter for you.

The Data Protection Commissioner's website is www.dataprotection.ie or you can contact their Office at:

Lo Call Number: 1890 252 231

E-mail: info@dataprotection.ie

Postal Address: Data Protection Commissioner

Canal House

Station Road

Portarlinton,

Co. Laois. R32 AP23