



EIRCODES AND DATA PROTECTION

IDMA Business Breakfast

Hugh Jones

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Relevant DP Definitions

- ▣ Personal Data
- ▣ Data Subject
- ▣ Data Controller
- ▣ Data Processor
- ▣ The Data Protection Rules



Eircode DP Status (1)

- ▣ “The (Eircodes) database is available commercially. There are no personal details in there.”
 - Eircode Consortium

- ▣ “In the Irish context, a person’s home address is an important part of their identity and is the second most important piece of personal information to verify a person’s identity.”
 - Annual Report of the Office of the DP Commissioner



EirCode DP Status (2)

“The Eircode will constitute personal data for the purposes of the Data Protection Acts and will therefore be subject to the protections and restrictions in those Acts.”

Office of the Data Protection Commissioner

- ▣ Interaction with Dept. of Communications on-going
- ▣ Formal decision pending
- ▣ New legislation expected in early 2015



Features of the



- ▣ Enhances Accuracy of processing
- ▣ Improvement in profiling, segmentation
- ▣ Reduction of confusion, duplication
- ▣ “More than a post-code – a smart location code”
- ▣ Improvement of overall data quality
- ▣ Avoids “post-code snobbery”
- ▣ Alignment with CSO Data Sets for analytics
- ▣ Accurate to every household and office
- ▣ Prevents error and fraud
- ▣ Accommodates future expansion



From this.....



To this....



Or This

- ▣ “The Artist Formerly Known as Prince”
- ▣ Or this...

▣ TAFKAP



Improve Accuracy?



To this...



Challenges with the EirCode

- ▣ “Encouraged” to adopt, but not mandatory
- ▣ Mixed messages re adoption
- ▣ Inevitable, but unfair comparison with IW
- ▣ No impact on current postal services
- ▣ Negative messages re need for code
- ▣ Concerns re costs for usage/access
- ▣ Concern re ‘random’ nature of code
- ▣ Not sequential, so not helpful
- ▣ Requires database access to validate
- ▣ “Too general AND too specific”



Current Status of Project

- ▣ Privacy Impact Assessment under way
- ▣ Timeline as outlined
- ▣ Expanding existing databases
- ▣ Licencing of Value Added Re-Sellers
- ▣ Enhancement of 'organisational knowledge'
- ▣ New 'washing' services being developed
- ▣ Opportunity for data quality reviews
- ▣ Improved granularity of Sales analysis
- ▣ Improved fraud prevention



Paradox

Ireland will go from being...

- ▣ The only OECD country **without** a post-code

To being...

- ▣ The only country in the world with **a unique identifier for every letter-box**



To Sum Up...

- ▣ Memorable? No.
- ▣ Logical? No.
- ▣ Sequential? No.
- ▣ Error-correcting? No.
- ▣ Privacy protecting? No.
- ▣ Open source? Hell, no!



Adoption of the Code

- ▣ Likely to be driven by commercial interests
 - Courier Companies
 - Government Departments
 - Emergency Services
- ▣ No Surprises!
- ▣ Limited daily look-up of database – no charge
- ▣ Commercial service providers
- ▣ Costs based on levels of access



Data Protection Considerations

- ▣ Data Controller Remains Data Controller
- ▣ VAR's as Data Processors
- ▣ Consortium will have Right of Audit of VAR's
- ▣ Focus on security and appropriate usage
- ▣ Privacy Charter from Consortium
- ▣ Publication of Privacy Impact Assessment Report
- ▣ Possible changes to Postal legislation
- ▣ Possible changes to Data Protection legislation



Suggested Next Steps

- ▣ Start with your own letter-box
- ▣ Consider appending to existing database
- ▣ Consider incorporating with data clean-up
- ▣ Engagement with Value-Added Re-sellers (VAR's)
- ▣ Modify procedures, forms, systems
- ▣ Review accuracy, currency of data
- ▣ Consider retention/destruction
- ▣ Plan enhanced marketing strategies
- ▣ Consider improved data analysis
- ▣ Prepare for changes to database fields

