

PRIVACY POLICY

Who we are:

[Company Name]

[Company Address]

[E-mail address/telephone number] of [company name]

[Name of data controller's representative] and [data protection officer] (if applicable).

Where do we process personal data:

[Company Name] stores and process personal data in [specify all countries – including where backup data may be held, if different]

Purpose of the processing:

[company name] process personal data for the following purpose(s)*:

**(this is a non-exhaustive list)*

- Client administration
- Direct Marketing
- Provision of goods or services
- Legal obligations
- Employee administration
- Monitoring (e.g. CCTV, web history, Apps, Cookies)
- Profiling of personal data
- Processing for a third party

The legal basis for this processing is (select as appropriate):

- Consent
- Legitimate interests (specify)
- Performance of a contract including possible consequences of failing to provide the personal data
- Legal obligation (Specify), including possible consequences of failing to provide the personal data
- To protect the vital interests of the data subject
- Performance of a task carried out in the public interest (Specify)

Recipient(s) of the personal data:

(A 'recipient' means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not)

[List of specific agencies/regulators to whom data is disclosed]

And/or – [List type of agencies/regulators to whom data is disclosed]

Details of transfers to third country/countries:

[Specify if personal data is being transferred outside of the EU]

[Indicate adequacy decision in relation to the third country]

[Specify safeguards in place]

Data Retention period:

[State the retention period for the different types of personal data stored (where appropriate)]

[Indicate if the basis is statutory/regulatory or data controller decision]

[If data controller decision, outline criteria used]

Your rights:

You have the following rights in respect to the personal data that [company name] hold on you. Please contact us at the address above in order to exercise any of these rights:

1. The right to be informed

You have the right to receive “fair processing information”.

2. The right of access

You have the right to obtain:

- Confirmation of your personal data being processed
- Access to a copy of your personal data
- And any other supplementary information

3. The right to rectification

You have the right to have your personal data corrected if it is inaccurate or incomplete

4. The right to erasure (includes withdrawal of consent)

You have the right to have your personal data erased, in the following circumstances:

- You withdraw consent.
- The personal data has to be deleted to comply with a legal obligation.
- The personal data was unlawfully processed.
- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected.
- Where you object to the processing and there is no superseding legitimate requirement to continue the processing.
- The personal data is processed in relation to the offer of “information society services” to a child.

5. The right to restrict processing

You have the right to ‘block’ or suppress processing of personal data

6. The right to data portability

You have the right to obtain and reuse their personal data for their own purposes across different services.

7. The right to object

You have the right to object to:

- Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling).
- Direct marketing (including profiling).
- Processing for purposes of scientific/historical research and statistics.

8. Rights in relation to automated decision making and profiling

You the right not to be subject to a decision when:

- It is based on automated processing.
- It produces a legal effect or a similarly significant effect on the data subject.

The right to complain:

If you feel that [company name] has not fulfilled its obligations under the General Data Protection Regulation 2016/679, then you have the right to lodge a complaint with the Data Protection Commissioner (DPC).

The DPC offers guidance on how to make a complaint here:

<https://www.dataprotection.ie/docs/Making-a-Complaint-to-the-Data-Protection-Commissioner/r/18.htm>

Automated decision making, including profiling:

[company name] do not use any automated decision making or profiling

-OR-

[company name] carry out automated decision making/profiling:

[company name] use [specify personal data] and analyse it to [specify outcomes of analysis].

These outcomes will [specify the significance and the consequences of the analysis]