# **Our Privacy Policy**

## 1. Scope

All people whose personal data is collected, in compliance with the requirements of the GDPR.

## 2. Responsibilities

2.1 The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to collecting/processing their personal data.

## 3. Privacy notice

#### 3.1 Who are we?

RYANS CLEANING are a market leading provider of event cleaning & waste management services. Our services range from cleaning and waste management to building services and pest control services. We employ more than 100 highly trained people and currently operate in the UK,NI and Ireland. We are a values-led and highly accredited business.

## 3.2 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access you have the right to request a copy of the information that we hold about you.
- Right of rectification you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing where certain conditions apply to have a right to restrict the processing.
- Right of portability you have the right to have the data we hold about you transferred to another organisation.
- Right to object you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: if RYANS CLEANING refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

#### 3.3 Disclosure of Your Information

We may disclose personal data to:

- Third parties who provide a service to us
- A public authority in the event that we are required to do so by law
- A third party where we are under a legal obligation to transfer it to that third party
- A third party where it is necessary to protect the vital interests of the data subject or another natural person

To the limited extent that 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 Article 46.2 of the GDPR. Please contact us if you wish to obtain information concerning such safeguards

#### 3.4 Links to other Sites

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

## 3.3 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by RYANS CLEANING (or third parties), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and RYANS CLEANING's Data Protection Officer.

The details for each of these contacts are:

	<b>Data Protection Officer contact details</b>	Supervisory authority contact details
Contact Name:	The Data Protection Officer	Data Protection Commissioner
Address line 1:	RYANS CLEANING	Canal House
Address line 2:	Unit 8, Stradavoher Retail Park	Station Road
Address line 3:	Thurles	Portarlington

Address line 4: Co Tipperary R32 AP23

Address line

5: Co. Laois

Email: info@Ryans Cleaning .ie info@dataprotection.ie

# 3.4 Privacy statement

#### Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

#### Information that we collect

There are instances where we invite or request individuals to provide us with their personal data, including through our websites. In addition, individuals may volunteer their personal data to us by various means of communication, e.g. by telephone, email or via our website.

In providing our services, we may also receive personal data indirectly. Categories of such personal data include: names, addresses, contact information and other information that is relevant to the provision of our services.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, last name, username or similar identifier, title and gender.
- Contact Data includes email address and telephone number.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes your username and password, your interests, preferences and feedback and your communication preferences.
- Usage Data includes information about how you use our website and services.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health

and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

# How we use Your Personal Data

We will only use your personal data when the law allows us to.

### **Purposes**

# **Purposes**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing at any time by contacting us.

Employment law and practice including:

- Communicating with you, our clients or other persons in the course of our business
  - Processing of job applications
  - Transferring information to third parties, including to our own service providers
  - Recruitment, vetting and screening
    - Pay, tax and pension
    - Health and safety
    - TUPE
    - Rostering
    - Training
    - Vehicle locating
    - Next of kin
    - Insurance claims handling

We will retain personal data only for as long as necessary for the purposes for which it was collected; as required by law or regulatory guidance to which we are subject

#### Client service

To carry our obligations arising from any client service contracts Our legal basis for processing for the personal data:

• Personal data: contractual performance, legitimate interest, legal obligation,

consent (marketing only)

- · Special category data: Employer rights and obligations, legal claims
- · Criminal convictions: as authorized by Data Protections Acts, Ireland and UK

The legitimate interests we pursue are to fulfil our legitimate purpose of running a commercial enterprise safely and profitably but only where our interests do not out weight the rights and freedoms of data subjects. We rely on legitimate interests as a basis for processing personal data as follows:

Any legitimate interests pursued by us, or third parties we use, are as follows:

- Next of kin
- Medical reports
- GPS tracking on company owned vehicles
- Documents to assess identity verification
- Marketing

The special categories of personal data concerned are:

- Health data
- · Racial and ethnic origin
- Religion (as required by Northern Ireland legislation)
- Trade union membership

# How we use your information

This privacy notice tells you how we RYANS CLEANING, will collect and use your personal data for Information contained in your CV or job application such as your name, address, private and corporate e-mail address and phone number;

- information contained in any documents that you send to any of us for identity verification purposes such as your passport or driving licence;
- financial information, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom or in the Republic of Ireland
- information that you provide about yourself when entering into a contract with us such as bank account details, PPS number, next of kin details, medical and health questionnaires or assessments, DBS or Garda screening documentation.
- Information contained in insurance claim forms
- GPS tracking on company owned vehicles
- Invoicing and billing
- Consent for Marketing
- CCTV imagery (incident details, names, address during client contract services)

# Why does RYANS CLEANING need to collect and store personal data?

For us to fulfill our obligations as an employer provide employment and to provide our service to clients, we need to collect personal data for the above-mentioned purposes. We are committed to ensuring that the information we collect, and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes RYANS CLEANING will contact you for consent.

# Will RYANS CLEANING share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to RYANS CLEANING in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf.

Third parties that we may use on your behalf include:

- · Issuing payslips and postal service
- GPS tracking of company vehicles
- Banking
- Pension and health insurance
- Insurance companies for both insuring of staff and claims handling
- Legal firms and consultants for employment related matters
- Third parties to enable the completion of pre-engagement screening checks e.g. DBS, Garda vetting, accreditation

If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will RYANS CLEANING use the personal data it collects about me? RYANS CLEANING will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary. RYANS CLEANING is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

#### 3.5 Retention periods

To continue to address the legitimate purpose for which the data was originally collected the retention period for insurance and employment purposes is 7 years.

Under what circumstances will RYANS CLEANING contact me? Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me? RYANS CLEANING at your request, can confirm what information we hold about you and how it is processed. If RYANS CLEANING does hold personal data about you, you can request the following information:

• Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the

#### EU.

- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of RYANS CLEANING or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this? RYANS CLEANING accepts the following forms of ID when information on your personal data is requested:

2 forms of ID from the following:

- Passport
- Drivers licence
- Birth Certificate
- Utility bill (from last 3 months)

A current version of this document is available to all stakeholders and members of staff on the RYANS CLEANING website and a link to it is provided on our corporate email.

### 3.6 Data Subject Rights

To the extent that we are a controller of your personal data you may request access to, rectification, or erasure of your personal data, or restriction of processing or object to processing of your personal data, as well as the right to data portability. In each case, these rights are subject to restrictions as laid down by law.

The following is a summary of your rights:

The right of access enables you to receive a copy of your personal data

- The right to rectification enables you to correct any inaccurate or incomplete personal data we hold about you
- The right to erasure enables you to ask us to delete your personal data in certain circumstances
- The right to restrict processing enables you to ask us to halt the processing of your personal data in certain circumstances,
- The right to object enables you to object to us processing your personal data on the basis of our legitimate interests (or those of a third party)
- The right to data portability enables you to request us to transmit personal data that you have provided to us, to a third party without hindrance, or to give you a copy of it so that you can transmit it to a third party, where technically feasible.

You have the right to lodge a complaint with 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.

If you wish to exercise any of these rights, please contact us (see Contact Us below). We will respond to your request within one month. That period may be extended by two further months where necessary, considering the complexity and number of requests.

We will inform you of any such extension within one month of receipt of your request. We may request proof of identification to verify your request. We have the right to refuse your request where there is a basis to do so in law, or if your request is manifestly unfounded or excessive, or to the extent necessary for important objectives of public interest.

### 3.7 Security and where we store your Personal Data

We are committed to protecting the security of your personal data. 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. We cannot guarantee the complete security of our database, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet.

We have implemented strict internal guidelines to ensure that your privacy is safeguarded at every level of our organisation. We will continue to revise policies and implement additional security features as new technologies become available. Where we have given you a password which enables you to access certain parts of our Site, you are responsible for keeping that password confidential. We ask you not to share your password with anyone.

Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our website. Any transmission of personal data is at your own risk. Once we receive your personal data, we use appropriate security measures to seek to prevent unauthorised access or disclosure.

# 3.8 Changes to this Privacy Statement

We reserve the right to change this statement from time to time at our sole discretion. If we make any changes, we will post those changes and update the "Last Updated" date at the bottom of this statement.

## 3.9 Contact Us

Questions, comments, requests and complaints regarding this statement and the personal data we hold are welcome and should be addressed to the Data Protection Office in writing at Unit 8 Stradavoher Retail Park, Thurles, Co. Tipperary.

Last Updated: 23/January/ 2019