



Privacy Manual

Document Control Sheet

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1 Privacy Statement – Access Data Installations Ltd

This privacy policy provides you with information about how we are handling your personal information in accordance with GDPR requirements.

This Policy applies to all personal information received by ADI Ltd in any format including electronic, paper or verbal.

This privacy policy is designed to demonstrate our firm commitment to privacy and to inform you of the personal data that we collect. It also sets out details of what personal data we process, why we process it, with whom your personal data is shared, and a description of your rights with respect to your personal data.

ADI Ltd respects the data privacy of its suppliers, customers and employees and has made the policy available on <https://www.adi.ie/> to illustrate our approach to data protection and privacy.

2 What personal data we collect

The personal information we collect encompasses, your name, address, email address, landline and mobile numbers, financial details, this is not an exhaustive list but is the basis of the information we primarily gather about you.

Suppliers & Subcontractors: Name, telephone number, address, job title, relevant email and financial account information and medical information.

Customers: Name, telephone number, address, job title, relevant email.

Employees: Name, telephone number, address, CV, Job applications, relevant email and, government identifier, financial account information, family information and medical information

3 How we collect personal data

The only source of gathering your personal information is when you provide the information to us when you visit us personally or speak to us by phone, via the contact form on website, email or write to us we will collect the necessary information.

Suppliers & Subcontractors: Personal data collected through email correspondence, supplier assessment forms and account set up process.

Customers: Personal data collected through email correspondence, customer feedback forms and account set up process.

Employees: Personal data collected through email correspondence, employee induction forms and recruitment process.

4 Using your personal data

Data protection law ensures that there is a justifiable and legal basis for the processing of your personal data. ADI Ltd requires personal data to conduct and maintain business relations as outlined below:

Suppliers & Subcontractors: We use your personal data to maintain our business relations for receiving and issuing payment of your services and/or products.

Customers: We use your personal data to maintain our business relations for providing you with our products. We use your personal data to process and dispatch orders, issue invoices/statements and respond to any queries or issues.

Employees: We use your personal data for employment and HR related purposes such as recruitment, payroll administration, training and development, information to contact close relatives in case of emergency and facilitating workplace communication. If requested, we may also need to share details of employee experience or qualifications with customer who have a legitimate interest in receiving this information so that they can be assured of the competence of personnel who will be carrying out work for them.

Also if we are requested by a regulatory body to share your personal information we will respond to this request accordingly.

5 Sharing of your personal data

In the normal daily business operations it will be necessary for us to share supplier and customer details with couriers, shipping companies, transport companies.

Sharing of personal information between suppliers and customers may be also be necessary for the following such reasons:

- Quality discussions (e.g. quality issue)
- Logistics discussion (e.g. shipment)
- New product development discussions (e.g. feasibility and technical reviews)
- Customer audit of suppliers (e.g. On-Site Assessments)

International transfer of personal information beyond Europe may occur if necessary as outlined above as many of our global supplier base is outside Europe.

Employee data may be shared with organisations that are involved in elements of ADI Ltd remuneration process and training and development where training provided by external providers.

Employee data, such as evidence of skills, qualifications or experience, may also be shared with customers who have a legitimate interest in confirming the competence of personnel who will be involved in work being done for them.

Other than the above sharing of personal data outlined, we will not share personal information without notification to our suppliers, customers, employees and we will also ensure that all appropriate security safeguards have been implemented to protect your personal information.

6 Protection and security of your personal data

ADI Ltd takes precautions to protect personal information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction. The organisation has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

ADI Ltd limits access to personal data on our server to management team members who are aware of their responsibilities to protect the security, confidentiality and integrity of that information.

As per GDPR requirements ADI Ltd will notify the Data Protection Commissioner (DPC) of a data security breach within 72 hours of becoming aware of the breach, unless the risk to rights and freedoms of data subjects (i.e. customer, supplier, employees) is unlikely.

We will continue to review our systems and we will implement additional security features as new technologies become available.

7 How long we retain personal data

We retain personal data for a period of time as long as we need it to fulfil the purposes for which we have initially collected it, unless otherwise required by law.

Any personal data that we collect, process and hold about you is retained only for as long as it is required such as outlined on supplier or customer contractual agreements and statutory and regulatory requirements such as employment law and company act legislations.

8 Your rights under Data Protection Law

Data protection laws grant you, as a Data Subject, certain 'information rights', which are summarized below:

1. **Information Request.** The right to receive a copy of and/or access the personal data that we hold about you, together with other information about our processing of that personal data.
2. **Update Data.** The right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update your data such that it is complete.
3. **Data Deletion.** The right, in certain circumstances, to request that we erase your personal data.
4. **Restrict Processing.** The right, in certain circumstances, to request that we no longer process your personal data for particular purposes.
5. **Object to Processing.** The right to object to our use of your personal data or the way in which we process it.
6. **Data Portability.** The right, in certain circumstances, to transfer your personal data to another organization.
7. **Review Automated Decisions.** The right to object to automated decision making and/or profiling.
8. **File a Complaint.** You have the right to complain to the Data Protection Commissioner. You also have the ability to complain to us via our email elainelong@adi.ie.

9 How you can raise a complaint

ADI Ltd management will facilitate any complaints or queries that you may have on your personal information. All complaints received will be fully investigated and acted on.

You can forward your complaint by email to elainelong@adi.ie

10 Changes to the Privacy Policy

If we make any changes to our privacy policy we will post the revised policy on our website <https://www.adi.ie/>