

**Rotospiral (Ireland) Ltd**

**Data Protection Policy**

Rotospiral (Ireland) Ltd is committed to protecting your privacy when you use our services and engage with us, this includes when you visit our website, get in contact with our business or use our services.

Rotospiral (Ireland) Ltd is a data controller. This data protection and privacy statement explains how we use information about you and the steps we take to protect your privacy.

Who are we?

When we refer to ‘we’ (or ‘our’ or ‘us’) we are referring to Rotospiral (Ireland) Ltd. We are based in Kilkenny, Ireland and have our registered offices at Knocktopher, Co. Kilkenny, Ireland R95 CYV3.

The delivery of high-quality services to our customers and the third parties we interact with remains one of Rotospiral (Ireland) Ltd.’s core objectives and is at the heart of all the activities we undertake.

What is the purpose of this notice?

The purpose of this privacy and data protection statement is to demonstrate our commitment to privacy and to assure you that in all your dealings with Rotospiral (Ireland) Ltd that we will ensure the safety and security of the personal data you provide to us.

This privacy and data protection statement is designed to ensure that the personal data you supply to us is.

* Obtained lawfully, fairly and in a transparent manner
* Obtained for only specified, explicit and legitimate purposes
* Adequate, relevant and limited to what is necessary for purpose for which it was obtained
* Recorded, stored accurately, securely, and where necessary kept up to date
* Kept only for as long as is necessary for the purposes for which it was obtained
* Kept in a form which permits identification of the data subject
* Processed only in a manner that ensures the appropriate security of the personal data including protection against unauthorised or unlawful access or processing

What is personal data/information?

Personal data is any information that can identify an individual living person. This includes but is not limited to a name, contact details, location data, a postal address, online browsing history, images or anything related to the physical, physiological, genetic, mental, economic, cultural or social identity of a person.

Certain personal data has been identified as “special category” under legislation.

Special category data includes:

* + - sexuality and sexual health
    - religious beliefs
    - ethnicity
    - physical or mental health data
    - trade union membership
    - political opinion
    - genetic/biometric data

Where we collect personal data, we will only process it under one or more of the following legal bases:

 to perform a contract with you

 where we have legitimate interests in processing the personal data and they’re not overridden by your rights

 in accordance with a legal obligation, including but not limited to employment, health and safety and taxation and financial accounting legislation

 where we have your consent (verbally and or in writing)

Why do we need your personal data?

In the course of business there may be different reasons why we might need your personal data, these include but are not limited to.

 your contact details to allow for efficient and effective communication, including clients, suppliers and third parties for purposes which may include the provision to you of information you have requested from us, to manage our relationship with you, operational communications, regulatory requirements, or asking for feedback

 to comply with various pieces of legislation including but not limited to, Health and Safety Law, Employment Law, Taxation Law, Revenue and Accounting Law

When might we need to share your personal data?

There may be times when we need to or are obliged to share your personal data with third parties. We will only disclose your personal data to:

* + - * Third party service providers and partners who assist and enable us to use the personal data to carry out specific functions that are in alignment and support the purpose you originally gave us the personal data for
* Approved Processors and Sub-Processors of Rotospiral (Ireland) Ltd where there are adequate and appropriate technical, organisational and legal safeguards in place, along with appropriate legal bases to protect this sharing of your data. We will ensure we have a written agreement (Data Processing or Sharing Agreement) in place with third parties we appoint to process personal data on our behalf
* Regulators, law enforcement bodies, government agencies, courts or other third parties where it is necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure
* Other people where we have your explicit consent and permission to share with.

Our guarantee - we only use what we need!

We will only collect and use your personal information if we need it to deliver a service or meet a requirement or satisfy your request. If we do not need personal information we will not ask you for it. We do not distribute, share or sell your personal data with any other services or third parties for their own use, and where possible we do not share your information with third parties without your prior knowledge and consent or process the personal information for a purpose other than that for which it was initially collected.

Retention – how long do we hold onto your personal data?

The length of time we keep your personal data depends on what it is and whether we have an ongoing business need to retain it (for example, to provide you with a service you’ve requested, for HR and recruitment purposes, or to comply with applicable legal, tax or accounting requirements).

We will retain your personal data safely and securely for as long as we have a relationship with you and for a period of time afterwards when we have an ongoing business need to retain it, in accordance with our internal data retention policies and practices. Following that period, we will make sure it’s securely deleted, destroyed or anonymised.

What are your rights in relation to your personal data?

As an individual whose personal data is processed by Rotospiral (Ireland) Ltd you have the following rights to control what personal information is used by us and how we use it.

## Your Rights:

As it is your personal data that we may hold, you have a number of rights over this data.

Some of your rights over your personal data include:

* Right to Basic Information and Transparent Communication (about the personal data we hold about you)
* Right of Access (the personal data we hold about you)
* Right to Withdraw Consent
* Right of Rectification
* Right to Erasure (the “right to be forgotten”)
* Right to Restrict Processing
* Right to Data Portability
* Right to Object
* Right to lodge a complaint with a supervisory authority

You can exercise the above rights at any time by sending an email to [**admin@rotospiral.com**](mailto:admin@rotospiral.com)or calling **+353 (0)56 776 8619** or by communicating to us via post at:

**Rotospiral (Ireland) Ltd,**

**Knocktopher,**

**Co. Kilkenny,**

**Ireland R95 CYV3**

*\*\*Please note that we may in some instances be required to verify your identity prior to the exercising of the aforementioned rights\*\**

How do we protect your information?

We take the safeguarding of your personal data very seriously and will employ the appropriate technical and organisational measures to protect the information and records we hold about you (paper and electronically), and we will only make them available to those who have a right to see it.

Examples of our security practices include:

 Controlling access to systems and networks allows us to stop people who are not allowed to view your personal information from getting access to it

 RotoSpiral Ltd. employs encryption to protect personal and sensitive data. This means that information is securely encoded so it cannot be read or accessed without authorised credentials or a decryption key. Encryption is implemented using secure algorithms (commonly referred to as ‘cyphers’) and follows industry standards to ensure confidentiality and integrity.

 Controlling access to the building and to the filing cabinets and file storage areas

 Ongoing training of relevant staff in data protection best practice and organisational policies allows us to make them aware of how to handle and process personal data and information and how and when to report when something goes wrong

 Regular testing of our technology and ways of working including keeping up to date on the latest security updates

Where can I get advice?

If you have any concerns or questions about how your personal information is handled by us, please contact our Data Protection point of contact at:

Email: [admin@rotospiral.com](mailto:admin@rotospiral.com)

Tel: +353 (0)56 776 8619

You can also get advice on data protection from the Data Protection Commissioner via:

* + [info@dataprotection.ie](mailto:info@dataprotection.ie)
  + [www.dataprotection.ie](http://www.dataprotection.ie)
  + <http://gdprandyou.ie>

**Your right of complaint to the office of the data protection commissioner’s office:**

If you are not satisfied with the outcome of the response you receive from Rotospiral (Ireland) Ltd in relation to your data access request, then you are entitled to make a complaint to the Data Protection Commissioner in writing who may investigate the matter for you.

The Data Protection Commissioner’s website is [**www.dataprotection.ie**](http://www.dataprotection.ie)

You can contact the Commissioner’s office at:

Phone: **01 7650100** or freephone **1800 437 737**

E-mail: [**info@dataprotection.ie**](mailto:info@dataprotection.ie)

Postal Address:

Data Protection Commissioner

6 Pembroke Row

Dublin 2

D02 X963