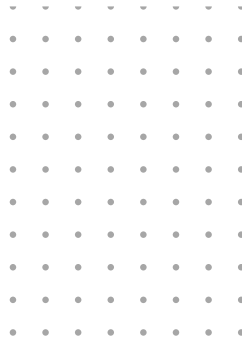


# CARRAIGHILL

*Insight distilled*

2020

# GDPR Policy



# GDPR Carraighill

## What is this report?

### Personal Data Protection Notice

#### CARRAIGHILL PERSONAL DATA PROTECTION NOTICE

Carraighill (“we”, “us” or “our”) is committed to protecting and respecting your privacy. This Data Protection Notice tells you about your privacy rights and sets out how we, as a controller, collect, use, process and disclose your personal data relating to your interactions with us.

## 1. Information we may collect from you

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect and process any type of personal data you provide to us during your interactions with us. You may have provided some of your personal data directly to us when you visited our website by volunteering personal data when subscribing. We may also receive personal data about you from various third parties and public sources such as LinkedIn. Categories of such personal data include names, addresses, contact information and other information that is relevant to the provision of our services.

If you do not provide us with your personal data, we may not be able to provide you with our services or respond to any questions or requests that you submit to us via our website. We will inform you when we ask for personal data which is a contractual requirement or is needed to perform our functions or to comply with our legal obligations.

## 2. How we use personal data we collect

We will only use your personal data for the purposes and legal bases set out in the table below:

Purpose(s) for Processing	Legal Basis for Processing
To register you as a new website user; and To notify you about changes to our Data Protection Notice.	The processing is necessary to support our legitimate interests in managing our business (to keep our records updated and to study how website users use our services) provided such interests are not overridden by your interests and rights.
To manage our relationship with you which may include: To contact you in relation to our services; and	The processing is necessary for the performance of our service to you
To act as an advisor. To comply with our regulatory and professional requirements; To prevent and detect fraud, money laundering or other offences; and To exercise our right to defend, respond or conduct legal proceedings.	The processing is necessary for us to comply with legal and regulatory obligation.

Purpose(s) for Processing	Legal Basis for Processing
<p>To send you email alerts and research communication that you have opted-in to receive by filling in our online forms or contacting us by email or by other means;</p> <p>To contact you regarding the services provided by us.</p>	<p>Where your consent is not required, and you have not objected, the use of the data is necessary for our legitimate interest in managing our business including legal, personnel, administrative and management purposes provided our interests are not overridden by your interests.</p>
<p>To customise your experience on our website, or to serve you specific content that is relevant to you.</p>	<p>The processing is necessary to support our legitimate interests in managing our business (to define types of client companies for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) provided such interests are not overridden by your interests and rights.</p>
<p>To process job applications.</p>	<p>The processing is necessary to perform a contract or enter into a contract with you.</p>

### 3. Retention of your personal data

We will store your personal data only for as long as necessary for the purpose(s) for which it was obtained. The criteria used to determine our retention periods include (i) the length of time we have an ongoing relationship and/or provide our services; (ii) whether there is a legal requirement to which we are subject; and (iii) whether the retention is advisable considering our legal position (such as regarding applicable statutes of limitations, litigation or regulatory investigations). Please contact us if you wish to obtain further information concerning our retention periods (see Contact Us below).

### 4. Your rights

You have several rights in relation to your personal data under applicable privacy and data protection law, which may be subject to certain limitations and restrictions. We will respond to any valid requests within one month, unless it is particularly complicated, or you have made repeated requests in which case we will respond, at the latest, within three months. We will inform you of any such extension within one month of receipt of your request, together with the reasons for the delay. You will not be charged a fee to exercise any of your rights unless your request is clearly unfounded, repetitive or excessive, in which case we will charge a reasonable fee in the circumstances or refuse to act on the request.

If you wish to exercise any of these rights, please contact us (see Contact Us section). We may request proof of identification to verify your request.

<b>Your Right</b>	<b>What this Means</b>
<b>Right to withdraw consent</b>	If we are processing your personal data on the legal basis of consent, you are entitled to withdraw your consent at any time (see Contact Us below). However, the withdrawal of your consent will not invalidate any processing we carried out prior to your withdrawal and based on your consent.
<b>Right of Access</b>	You can request a copy of the personal data we hold about you.
<b>Right to Rectification</b>	You have the right to request that we correct any inaccuracies in the personal data we hold about you and complete any personal data where this is incomplete.
<b>Right to Erasure ('Right to be Forgotten')</b>	<p>You have the right to request that your personal data be deleted in certain circumstances including:</p> <ul style="list-style-type: none"> <li>• The personal data are no longer needed for the purpose for which they were collected;</li> <li>• You withdraw your consent (where the processing was based on consent);</li> <li>• You object to the processing and there are no overriding legitimate grounds justifying us processing the personal data (see Right to Object below);</li> <li>• The personal data have been unlawfully processed; or</li> <li>• To comply with a legal obligation.</li> </ul> <p>However, this right does not apply where, for example, the processing is necessary:</p> <ul style="list-style-type: none"> <li>• To comply with a legal obligation; or</li> <li>• For the establishment, exercise or defence of legal claims.</li> </ul>
<b>Right to Restriction of Processing</b>	<p>You can ask that we restrict your personal data (i.e. keep but not use) where:</p> <ul style="list-style-type: none"> <li>• The accuracy of the personal data is contested;</li> <li>• The processing is unlawful, but you do not want it erased;</li> <li>• We no longer need the personal data, but you require it for the establishment, exercise or defence of legal claims; or</li> <li>• You have objected to the processing and verification as to our overriding legitimate grounds is pending.</li> </ul> <p>We can continue to use your personal data:</p> <ul style="list-style-type: none"> <li>• Where we have your consent to do so;</li> <li>• For the establishment, exercise or defence of legal claims;</li> <li>• To protect the rights of another; or</li> <li>• For reasons of important public interest.</li> </ul>
<b>Right to Data Portability</b>	<p>Where you have provided personal data to us, you have a right to receive such personal data back in a structured, commonly-used and machine-readable format, and to have those data transmitted to a third- party data controller without hindrance but in each case only where:</p> <ul style="list-style-type: none"> <li>• The processing is carried out by automated means; and</li> <li>• The processing is based on your consent or on the performance of a contract with you.</li> </ul>

<b>Right to Object</b>	You have a right to object to the processing of your personal data in those cases where we are processing your personal data in reliance on our legitimate interests. In such a case we will stop processing your personal data unless we can demonstrate compelling legitimate grounds which override your interests and you have a right to request information on the balancing test we have carried out. You also have the right to object where we are processing your personal data for direct marketing purposes.
<b>Right to Complain</b>	You have the right to lodge a complaint with the Data Protection Authority, 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.

## 5. 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 website, 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.

## 6. Changes to this Data Protection Notice

We reserve the right to change this Data Protection Notice from time to time at our sole discretion. If we make any changes, we will post those changes here and update the "Last Updated" date at the bottom of this Data Protection Notice. However, if we make material changes to this Data Protection Notice we will notify you by means of a prominent notice on the website prior to the change becoming effective. Please review the Data Protection Notice whenever you access or use this website.

## 7. Contact Us

Questions, comments, requests and complaints regarding this Data Protection Notice and the personal data we hold are welcome and should be addressed to:

Rachel Breen | Data Protection Officer | Carraighill | Eagle House | 5 Marine Road | Dun Laoghaire | Co. Dublin

admin@carraighill.com | +353 1 663 6730

