

## Irwin M&E – Data Privacy Notice

### 1. This Document

This document is intended to provide you with important information about how we process your personal data under the new General Data Protection (GDPR). This includes:

- Details of personal data we hold;
- How we store it;
- What we do with it;
- Why we hold it and;
- How long we hold it for

### 2. Introduction

Your personal data by definition is ‘data which by itself or with other data available to us can identify you.’

We are Irwin M&E Limited, the data controller. You can contact our GDPR Representative at:

Unit 4 Diviny Drive  
Carn Industrial Estate  
Portadown  
Co.Armagh  
BT63 5WE

Email: [info@irwinm-e.com](mailto:info@irwinm-e.com)

### 3. Types of Personal Data we Collect and Use

Most of the data we will collect directly from you, however data collected indirectly is also mentioned in this privacy notice.

The personal data we may use about you as a personal/business client may include:

- Full name and personal details including contact information (i.e. business/home address and address history, email address, home/business/mobile telephone numbers)
- Your emergency contact details/next of kin
- Date of birth/age/gender
- National Insurance number
- Recruitment records, including personal information included in a CV, interview notes, references and copies of qualification certificates
- Financial details (e.g. bank details, payroll records, tax code)
- Medical Information (employees only)
- Insurance information (for contractual reasons)
- Personal identification and proof of address
- Educational/employment details including history with previous employers
- Personal data on clearance forms that you have given your consent for (including information from the policy that is relevant and ought to be disclosed but does not form part of the criminal record)

- Any disciplinary, grievance records, including investigation records, minutes of hearings, warning letters and related correspondence
- Appraisals and objectives set
- Annual leave and other leave records including types of and reasons for leave being taken and related correspondence
- Any termination of employment documentation including resignation letters, dismissal letters, redundancy letters and related correspondence
- Photographs
- Tracker information on company vans (for security reasons)
- Penalty points on driving licence (for insurance purposes)

#### **4. Providing your Personal Data**

We will tell you if providing personal data is optional, including if we ask for your consent to process it, including your AccessNI certificate and other clearance forms.

#### **5. How we Keep your Data Safe**

We protect your information with security measures under the laws that apply. We keep our computer, files and buildings secure.

#### **6. How Long we Keep your Data**

We hold your data while you are an employee, sub-contractor or client for a period of time. After that, it is held in accordance with our legal and regulatory obligations. We do not hold it for longer than necessary.

#### **7. Meeting our Legal and Regulatory Obligations**

To use your data lawfully we rely on one or more of the following Legal bases:

- Performance of contract
- Legal obligation
- Protecting the vital interests of you and others
- Public interest
- Our legitimate interests
- Your consent

If you fail to provide certain personal information when requested or required, we may not be able to perform the contract we have entered into with you, or may be prevented from complying with our legal obligation. You may also be unable to exercise your statutory or contractual rights.

#### **8. Your Data and Third Parties**

Sometimes we share your data with third parties for example:

- Sub-contractors/Clients and other parties who help service your contract with us
- Main contractors for clearance purposes (i.e. for CPD clearance)
- Companies and persons providing a service for us (i.e. our IT supplier)
- Legal and professional advisors (i.e. our financial auditors)
- Government bodies in the UK (i.e. HMRC)
- Anyone else where we have your consent or as required by law

## 9. Your Personal Rights

Your rights are as follows (noting that these rights don't apply in all circumstances and that data portability is only relevant from May 2018):

- The right to be informed about our processing of your personal data
- The right of access your personal data and see how we process it
- The right to rectification of your data if it is incorrect or inaccurate
- The right to erasure of your data (known "as the right to be forgotten") only when there is no reason for its continued processing e.g. Legal reasons
- The right to restrict processing of your personal data
- The right to data portability i.e. To move, copy or transfer your personal data
- The right to object to the processing of your personal data
- The right not to be subject to automated decision-making including profiling

It is important that the personal information we hold on you is accurate and up to date. Please keep us informed if your personal information changes so that our records can be updated. The company cannot be held responsible for any errors in your personal information in this regard, unless you have notified the company of the relevant change.

## 10. Changes to this Privacy Notice

The company reserves the right to update or amend this privacy notice at any time. If you have any Data Protection queries, please contact [info@irwinm-e.com](mailto:info@irwinm-e.com).