

# Privacy Policy

## 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our employees, website visitors, customers and suppliers.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and customers/suppliers; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.5 In this policy, "we", "us" and "our" refer to *Ecoflex Surfacing Ltd.*

## 2. How we use your personal data

- 2.1 We may process information contained in or relating to any communication that you send to us i.e. Emails, Online Web Query, Letters. This data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our business and communications with users.
- 2.2 We may process any of your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 2.3 We may process any of your personal data where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 2.4 We may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject i.e Revenue Guidelines

## 3. Providing your personal data to others

- 3.1 We may disclose your personal data to our legal team and insurers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 3.2 We may disclose specific personal details to our suppliers or subcontractors insofar as reasonably necessary for the operating of our day to day business.
- 3.3 We may disclose your enquiry data to our suppliers for the purpose of enabling them to offer advice on relevant goods and/or services. Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.

## 4. International transfers of your personal data

- 4.1 Our files are stored securely with "Dropbox" - Dropbox Is fully compliant with GDPR - <https://www.dropbox.com/security/GDPR>
- 4.2 The hosting facilities for our website are supplied by "WIX" whose offices are situated in Luxembourg, Israel & USA. "Wix" are fully compliant with GDPR - <https://support.wix.com/en/article/general-data-protection-regulation-gdpr>
- 4.3 Our email accounts are held with Microsoft who are fully compliant with GDPR - <https://privacy.microsoft.com/en-us>
- 4.4 We use Bank Of Ireland for our online banking system. Bank of Ireland are fully compliant with GDPR - <https://www.bankofireland.com/privacy/data-protection-notice/>

## 5. Retaining and deleting personal data

- 5.1 Personal data (Employees, Suppliers, Customers) that we process for any purpose shall not be kept for longer than is necessary for that purpose. Revenue regulations necessitates the retention of all books, records and documents relevant to our business for a period of six years. All soft copy files are stored on password protected computers. Hard copies are securely stored in our office at Sheepwalk, Frenchpark, Co. Roscommon, F45 PA06. Document destruction is carried out regularly in-house or by a registered document destruction company. All computer and hard files are reviewed annually.
- 5.2 We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## 6. Amendments

- 6.1 We may update this policy from time to time by publishing a new version on our website.
- 6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 6.3 We may notify you of changes to this policy by email.

## 7. Your rights

Your principal rights under data protection law are:

(a) *the right to access;*

You may instruct us to provide you with any personal information we hold about you by contacting us directly using the details below.

(b) *the right to rectification;*

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

(c) *the right to erasure;*

In some circumstances you have the right to the erasure of your personal data without undue delay i.e. When the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However we may be unable to erase some data as it may be necessary to retain due to legal obligations (Revenue) or for the establishment, exercise or defence of legal claims.

(d) *the right to restrict processing or object to processing;*

In some circumstances you have the right to restrict the processing of your personal data i.e. you contest the accuracy of the personal data; processing is unlawful but you oppose erasure. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

(e) *the right to data portability;*

You have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

(f) *the right to complain to a supervisory authority;*

You may make a complaint by contacting us directly using the details below.

(g) *the right to withdraw consent.*

You have the right to withdraw consent to our use of your Personal Data. We may not be able to comply with all requests due to legitimate business interests i.e the proper running of our business and legal requirements (Revenue); when data is required for the establishment, exercise or defence of legal claims;

**All requests should be made by post to:**

Data Controller, Ecoflex Surfacing Ltd, Sheepwalk, Frenchpark, Co. Roscommon, F45 PA06

**or by email to:**

[info@ecoflex.ie](mailto:info@ecoflex.ie)

**Please Note:** We may withhold personal information that you request to the extent permitted by law.

## **8. About cookies**

- 8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 8.2 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **9. Cookies used by our service providers**

- 9.1 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.
- 9.2 We use *WIX* to *host our website*. This service uses cookies. You can view the privacy policy of this service provider at <https://www.wix.com/about/privacy>

## **10. Our details**

- 10.1 We are registered in Ireland under registration number *N218874*, and our registered office is at *Sheepwalk, Frenchpark, Co. Roscommon, F45 PA06*.
- 10.2 Our principal place of business is at *Sheepwalk, Frenchpark, Co. Roscommon, F45 PA06*.
- 10.3 Our website is owned and operated by *Ecoflex Surfacing Ltd*.
- 10.4 You can contact us:
  - (a) by post, to *Sheepwalk, Frenchpark, Co. Roscommon, F45 PA06*.
  - (b) using our website contact form at: <https://www.ecoflex.ie/contact>
  - (c) by telephone, on 00353 9498 70700 from Mon-Fri between 9am-5pm
  - (d) by email, using [info@ecoflex.ie](mailto:info@ecoflex.ie)

## **11. Data Controller**

- 11.1 Our data control is carried out by Tina Surlis ([tina@ecoflex.ie](mailto:tina@ecoflex.ie))