

LAGOONA IFSC is committed to protecting and respecting your privacy.

## **LAGOONA IFSC Privacy Policy**

**LAGOONA IFSC** is committed to protecting and respecting your privacy. This Privacy Policy together with any disclaimers sets out the basis on which any personal data we collect from you or that you provide to us, or that is provided to us relating to you by any means will be processed.

### **Information we may collect from you**

We collect personal data from you which you volunteer when you provide such personal data to us, or via our services with which you interact. We may also be given other personal data relating to you by other persons, or we may obtain such other personal data about you as may be provided to us in the course of our legitimate business activities.

Online aggregate data:

When you access our website, your device's browser provides us with information such as your IP address, browser type, access time and referring URL which is collected and used to compile statistical data. This information may be used to help us to improve our website and the services we offer, and to offer services to you.

Under GDPR we now delete IP addresses within 30 days and so all data gleaned from normal traffic is anonymous.

When you buy, call or use a service:

When you deal with us or our company we may need you name, phone numbers, emails etc, all data that you provide to us. We only use that data to continue our dealings until concluded. We do not process that data outside of our dealings nor do we communicate that data to any third party without your consent.

### **Security and where we store your personal data**

In line with the GDPR we are committed to protecting the privacy of your personal data.

We store your data securely within our premises, within our company management software and our accounting systems.

We share your data where applicable only in a secure manner and only with your consent, to comply with legal requirements.

## **Uses made of your personal data**

We may use your data to send you information relating to our services, events and products which may be of interest to you. If you do not want us to use your data in this way, please notify us to that effect. Also to carry out our obligations arising from any contracts entered into between you and us.

We keep your Data for varying periods according to our **Data Retention Schedule** and in line with relevant legislation and recommendations.

## **Links to other sites**

Our website may, from time to time, contain links to and from other websites. If you follow a link to any of those websites, please note that those websites have their own privacy policies and that we do not accept any responsibility or liability for those policies. Please check those policies before you submit any data to those websites.

## **Protection of the privacy of personal information**

In order to protect the privacy of personal information, LAGOONA IFSC takes all due care to protect personal information it holds from any loss, unauthorised access, modification, use, disclosure and disposal

- has in place a **Data Protection Breach Policy** which will be used to investigate fully any potential data protection breaches
- has in place appropriate staff training to ensure that all staff involved in processes which handle personal information are aware of their responsibilities in relation to the safeguarding and handling of personal information
- only uses personal data for the purposes for which it was collected.
- is subject to the Data Protection Acts 1988 and 2003
- is subject to the Freedom of Information Act 2014

## **Your rights**

As an individual, under EU law you have certain rights to apply to us to provide information or make amendments to how we process data relating to you. These rights apply in certain circumstances and are set out below: -

1. The right to access data relating to you ('access right').
2. the right to rectify/correct data relating to you ('right to rectification')

3. The right to object to processing of data relating to you ('right to object').
4. The right to restrict the processing of data relating to you ('right to restriction').
5. The right to erase/delete data relating to you (i.e. the "right to erasure").
6. The right to 'port' certain data relating to you from one organisation to another ('right to data portability').

**The controller for the purposes of GDPR is Jayne O'Toole,  
info@thesmithgroup.ie**

### **Changes to this policy**

We reserve the right to change this Policy from time to time in our sole discretion. If we make any changes, we will post those changes here so that you can see what information we gather, how we might use that information and in what circumstances we may disclose it. By continuing to use our site or our services or otherwise provide data after we post any such changes, you accept and agree to this Policy as modified.

### **Contact Us**

Questions, comments, requests and complaints regarding this Policy and the information we hold are welcome and should be addressed to us at info@thesmithgroup.ie

Or

The Smith Group Ltd,  
5 Fownes Street Upper,  
Temple Bar,  
Dublin 2.

All requests will be dealt with promptly and efficiently.

**22<sup>nd</sup> May 2018**