

Data Privacy Policy

TELCOM LIMITED

Contents

Your Privacy Entitlements.....	2
1. Introduction	2
2. Personal Data	2
3. Legal basis for processing any personal data	3
4. Consent	3
5. Disclosure	3
6. Retention Policy	4
7. Data storage	5
8. Your rights as a data subject	5
9. Access to Personal Data	5
10. Personal Data Requests.....	6
11. Complaints	6

Your Privacy Entitlements

1. Introduction

- 1.1 The purpose of this document is to set out the privacy entitlements of Data Subjects (living persons), as defined in the General Data Protection Regulation (GDPR). Privacy can only apply to information that is not already in the public domain and GDPR only applies to such personal data.
- 1.2 The General Data Protection Regulation (GDPR) is a European Union Regulation that sets out the data entitlements of data subjects and the obligations of those who process the personal data of data subjects. GDPR seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU.

2. Personal Data

- 2.1 Our company collects data from you and uses that data to provide you with telecommunications services.
- 2.2 Our company in its capacity as your agent works as a Data Processor. Our company acts on the instructions of its client and will work hard to ensure that the client is fully GDPR compliant.
- 2.3 We collect personal data about you from the application forms and questionnaires you may be asked to complete; we also gather personal data from records of our correspondence, phone calls, emails and details of your visits to our website, including but not limited to personally identifying information like Internet Protocol (IP) addresses. This information can be used to identify visitors to our website and to collect statistics about the behaviour of visitors to our website.
- 2.4 Our website uses cookies; a cookie is a text file that a Web browser stores on a user's machine. Cookies are a way for Web applications to maintain application state. They are used by websites for authentication, storing website information/preferences, other browsing information and anything else that can help the Web browser while accessing Web servers. If you do not wish to have cookies placed on your computer, you should set your browser to refuse cookies before using our website.
- 2.5 Data Minimisation Principle: We will only collect the information we need so that we can ensure adequate information is provided to our employer/clients consistent with the requirements of the placement relevant to you.
- 2.6 This agency does not sell or broker your data.

3. Legal basis for processing any personal data

This company relies upon the following legal bases for data collection:

- 3.1 Information is required to perform our role as your telecommunications service provider.

4. Consent

Through agreeing to this privacy notice you are consenting to us processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing liamtully@telcom.ie or writing to us, at the address provided in section 9 of this document.

5. Disclosure

5.1 A necessity of our contractual engagement is that we share your personal data with our employer/clients. We have in place Data Sharing Agreements or Data Processing Agreements with all such employer/clients and we have done our utmost to ensure that all such parties process your data in a manner that is consistent with this Privacy Notice and GDPR. Our employer/clients may themselves be subject to third party audits either in the form of ethical audits, governmental/statutorily required audits or legal obligations, these are deemed a necessity of the contract of engagement between you and our company and on this legal basis your personal data will be shared to comply with these requirements.

5.2 We do not broker or pass on information gained from your engagement with the agency. However, we may disclose your Personal Information to meet legal obligations, regulations or valid governmental requests. The agency may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of our company, its clients and/or the wider community.

6. Retention Policy

We will process personal data for the duration of any contract. After the contract has expired we will continue to store personal data only for the periods needed to meet any legal obligations. After these periods any personal data not needed will be deleted.

7. Data storage

Data is held in Ireland in our Private Cloud Solution. We do not store personal data outside the EEA.

8. Your rights as a data subject

For the entirety of the time that we are in possession of your data, you have the following rights:

- 8.1 **Right of access:** you have the right to request a copy of the information that we hold about you.
- 8.2 **Right of rectification:** you have a right to correct data that we hold about you that is inaccurate or incomplete.
- 8.3 **Right to be forgotten:** in certain circumstances you can ask for the data we hold about you to be erased from our records.
- 8.4 **Right to restriction of processing:** where certain conditions apply you have a right to restrict the processing.
- 8.5 **Right of portability:** you have the right to have the data we hold about you transferred to another organisation.

- 8.6 **Right to object:** you have the right to object to certain types of processing such as direct marketing.
- 8.7 **Right to object:** to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.

These rights may on occasion need to be modified/curtailed by statutory or competing obligations, for example, you may request that we delete your data, however if we have been your employer will can only do so after the statutory period of record retention has expired. In the event that we are obliged to refuse your request in accordance with your data subject rights, or if we are obliged to place conditions on our assent to your request, we will provide you with a reason as to why, which you have the right to legally challenge.

At any time following a request from you we can confirm what information we hold about you, as well as how and why it is being processed.

9. Access to Personal Data

Access to personal data will require proof of identification.

We will accept as valid the following forms of ID when information on your personal data is requested

- a copy of your national ID card, driving license, passport, birth certificate and a utility bill not older than three months.
- A minimum of one piece of photographic ID listed above and a supporting document is required.
- If we are dissatisfied with the quality, further information may be sought before personal data can be released.
- All requests should be made to liamtully@telcom.ie or in writing to us at Attn: **Data Protection Office, Telcom Limited, D9 Nutgrove Office Park, Dublin 14**

10. Personal Data Requests

You can request any of the following personal data at any time.

- Identity and the contact details of the person or organization that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of our company or a third party such as one of its clients, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (Data Protection Regulator).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

11. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by us or by our partners, you have the right to complain to liamtully@telcom.ie. If you do not get a response within 30 days you can complain to the OFFICE OF THE DATA COMMISSIONER, Supervising Authority of Ireland.