



Allwood Treecare Privacy & Data Protection Policy Statement June 2018

In the course of its daily organisational activities Allwood Treecare Ltd acquires, processes and stores personal data in relation to:

- Employees of Allwood Treecare Ltd
- Customers of Allwood Treecare Ltd
- Third party service providers engaged by Allwood Treecare Ltd

In accordance with the General Data Protection Regulation this data must be acquired and managed fairly. Not all staff members will be expected to be experts in Data Protection legislation. However, Allwood Treecare Ltd is committed to ensuring that its staff have sufficient awareness of the legislation in order to be able to anticipate and identify a Data Protection issue, should one arise. In such circumstances, staff must ensure that the Data Controller is informed, and in order that appropriate corrective action is taken.

Due to the nature of the services provided by Allwood Treecare Ltd, there is regular and active exchange of personal data between Allwood Treecare Ltd and its Data Subjects. In addition, Allwood Treecare Ltd may exchange personal data with Data Processors on the Data Subjects' behalf.

This is consistent with Allwood Treecare Ltd's obligations under the terms of its contract with its Data Processors. Allwood Treecare Ltd are not required to appoint a Data Protection Officer.

This policy provides the guidelines for this exchange of information, as well as the procedure to follow in the event that a Allwood Treecare Ltd staff member is unsure whether such data can be disclosed. In general terms, the staff member should consult with the Data Controller to seek clarification should the need arise.

Data protection is everyone's responsibility and I hope that this policy will assist you in understanding what is required of you under data protection legislation and that it sets a standard that all staff can achieve.

This Privacy and Data Protection Policy will be reviewed regularly in light of any legislative or other relevant developments.

Damien Hussey
Managing Director

14th June 2022



Allwood Treecare Privacy & Data Protection Policy

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1.0 Introduction

The purpose of this document is to provide a concise policy statement regarding the Data Protection obligations of Industrial and Domestic Furniture (Tullamore) Ltd trading as Allwood Treecare Ltd, hereafter referred to as '*Allwood Treecare Ltd*' or '*the Company*'. This includes obligations in dealing with personal data, in order to ensure that the Company complies with the requirements of the relevant data protection legislation, namely the General Data Protection Regulation (2018).

2.0 Rationale

The Company must comply with the Data Protection principles set out in the relevant legislation and as a Data Controller (Article 20 of General Data Protection Regulation 2018). This Policy applies to all Personal Data collected, processed and stored by the Company in relation to its staff, customers, clients and service providers in the course of its activities. The Company makes no distinction between the rights of Data Subjects who are employees, and those who are not. All are treated equally under this Policy.



3.0 Scope

The policy covers personal data held in relation to data subjects by the Company. The policy applies equally to personal data held in manual and automated form.

All Personal and Sensitive Personal Data will be treated with equal care by the Company. Both categories will be equally referred to as Personal Data in this policy, unless specifically stated otherwise. Employees of the Company should refer to '*Data Protection, Electronic Communications and Social Media – A Guidance Document for Employees and Sub-contractors*' for additional information on the personal information that the Company stores in relation to employees.

This policy should be read in conjunction with the associated Subject Access Request Procedure and the Data Incident Log in the Appendix to this document.

4.0 What information do we require:

Allwood Treecare Ltd is a Controller of the personal data you the customer, employee or sub-contractor (as Data Subjects) provide us. We collect the following types of personal and non-personal data from you, depending on your relationship to the Company:

- Personal Data: name, address, PPSN, telephone number, email address, payment information and IP address.
- Non-Personal Data: browser types and cookies

Note: if you provide us with personal data about a third-party (business referrals and recommendation, suppliers or potential employees) you warrant that you have obtained the express consent from the third-party for the disclosure and use of their personal data.

5.0 What is our legal basis for using your personal data?

Any time we process your personal data, we must have a legal basis to do so. The various ways we process your personal data and the legal basis we rely on are outlined below:

1. Performance of our contract with you
We process your personal data in order to be able to provide you with the services that we have agreed with you.
2. Compliance with our legal obligations
We are required to process your personal data to comply with various legal and regulatory obligations.
3. Where you provide consent
We may, at times, request your consent to process your personal data for specific reasons. For example, we will request your consent to directly market products or services of third parties to you.



We require your personal data in order to provide you with the following services:

- To provide services and fulfil our obligations to you our customers
- To provide customer care
- To process payments
- To detect incorrect order details
- To communicate with you our customers and consenting subjects regarding our services and promotional offers
- To provide you with information about products or services that you request from us
- To review job applications

6.0 What do we do with the information?

The security of your data is vitally important to us and we take appropriate technical and organisational measures to protect it.

Your data will not be transferred to any third-party unless this is required for one of the following reasons:

- In order to fulfil the service ordered and meet our obligations regarding payments to you
- Irish law enforcement request, Court order or statutory requirement
- Merger, acquisition of company or sale of company assets.

Any such third-party will have similar appropriate data protection policies.

We do not and never shall sell your personal data to third parties for marketing or advertising purposes.

7.0 How long do we keep it?

We will keep your personal data as long as is required to fulfil our obligations to you. After we have fulfilled our obligations, under Irish law and therefore the General Data Protection Regulation, we are required to keep your documents for a further 6 years. After this period, your personal data will be irreversibly destroyed. Any personal data held by us for marketing and service update notifications will be kept by us until such time that you notify us that you no longer wish to receive this information.

8.0 What about security

Allwood Treecare Ltd take all reasonable steps including appropriate technical and organisational measures to protect your Personal Data.



9.0 What are your rights?

Under GDPR, should you believe that any personal data we hold on you is incorrect or incomplete, you have the ability to make reasonable requests to see this information, rectify it or have it deleted. Please contact us and request a Data Subject Access Request Form.

In the event that you wish to complain about how we have handled your personal data, please contact our Data Controller at gdpr@allwoodtreecare Ltd.ie or in writing to Data Controller, Allwood Treecare Ltd, Axis Business Park, Tullamore, Co. Offaly, Ireland. Our Data Controller will then look into your complaint and work with you to resolve the matter.

If you still feel that your personal data has not been handled appropriately according to the law, you can contact the Data Protection Commissioner www.dataprotection.ie and file a complaint with them.

10.0 What about Cookies?

We may store some information on your computer in the form of a "cookie". A Cookie will permit us to maintain our service to match your needs, interests and preferences. You have a right to refuse to accept cookies.

A cookie is a small text file that is saved on your computer. Most web sites deliver cookies to provide visitors access to various functions on the website. Cookies can be long-lived or short lived. The long-lived cookie holds information and compares it with information you display when you return. Web sites that recognise you when you return and provide access codes automatically are examples of this. The short-term cookies are known as session cookies. These are stored temporarily during your visit and are not stored in your computer for long and are regularly deleted when you close your computer. Long lasting cookies can be deleted from "documents and settings" on your computer.

You can set your computer to block cookies by setting your browser to reject them. However, you may lose many functions that you at present take for granted. Cookies have become like unseen automatic servants - doing things repeatedly that would otherwise require our deliberate intervention.

11.0 Subject Access Requests

Any formal, written request by a Data Subject for a copy of their personal data (a Subject Access Request) will be referred, as soon as possible, to the Data Controller, and will be processed free of charge within one month of the date of the request in line with the GDPR.

It is intended that by complying with these guidelines, Allwood Treecare Ltd will adhere to best practice regarding the applicable Data Protection legislation.



12.0 Third-Party processors

In the course of its role as Data Controller and as a service provider Allwood Treecare Ltd engages a number of Data Processors to process Personal Data on its behalf. In each case, a formal, written contract is in place with the Processor, outlining their obligations in relation to the Personal Data, the specific purpose or purposes for which they are engaged, and the understanding that they will process the data in compliance with the Irish Data Protection legislation.

Data Processor(s) include:

Payroll and/or subcontractor software?

13.0 Closed Circuit Television

Allwood Treecare Ltd is obliged to regulate the management, operation and use of the closed-circuit television (CCTV) systems within and exterior to company premises and facilities.

The system comprises a number of fixed and dome cameras located around the company premises. The Company follows the Data Protection Commissioner's published guidelines and is in accordance with the General Data Protection Regulation 2018.

The system is wholly owned and operated by the Company.

Objectives of the System

- To act as a deterrent against criminal activity affecting property belonging to the company.
- To increase safety of staff, customers and visitors to Allwood Treecare Ltd premises
- The System will not be used to monitor the movements of staff, customers or visitors.
- The CCTV system may be used to investigate security and health and safety related incidents (including claims of bullying or harassment) in order to secure evidence, should such incidents occur.

Notification of presence of CCTV

The Company will provide a copy of this CCTV Policy on request to staff, customers, contractors and visitors to the premises. This policy describes the purpose and location of CCTV monitoring, a contact number for those wishing to discuss CCTV monitoring and guidelines for its use. Appropriate signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation. Adequate signage will also be prominently displayed at the entrance to Allwood Treecare Ltd property. Signage shall include the name and contact details of the Data Controller as well as the specific purpose(s) for which the CCTV camera is in place in each location.

WARNING**CCTV cameras in operation**

Images are being monitored and recorded for the purpose of crime-prevention, the prevention of anti-social behaviour, the prevention of bullying, for the safety of our staff and customers and for the protection of Allwood Treecare Ltd and its property. This system will be in operation 24 hours a day, every day. These images may be passed to An Garda Síochána.

This scheme is controlled and operated by Allwood Treecare Ltd

For more information contact gdpr@allwoodtreecare.ie

Storage and Retention of CCTV images

Accordingly, the images captured by the CCTV system will be retained for a maximum of 28 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

Access to CCTV images

Access to the CCTV system and stored images will be restricted to authorised personnel, i.e. the Data Controller or Directors of the Company.

In relevant circumstances, CCTV footage may be accessed:

- By An Garda Síochána where Allwood Treecare Ltd (or its agents) are required by law to make a report regarding the commission of a suspected crime; or
- Following a request by An Garda Síochána when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on Company property, or
- To the HSE and/or any other statutory body charged with child safeguarding; or
- To assist the Company in establishing facts in cases of unacceptable employee behaviour



- To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to the Data Controller of Allwood Treecare Ltd or,
- To individuals (or their legal representatives) subject to a court order.
- To the Company's insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

Requests by An Garda Síochána: Information obtained through video monitoring will only be released when authorised by the Data Controller following consultation with the Directors. If An Garda Síochána request CCTV images for a specific investigation, An Garda Síochána will require a warrant and accordingly any such request made by An Garda Síochána should be made in writing and the Company should immediately seek legal advice.

14.0 Revisions and amendments to this Policy

TITLE: Allwood Treecare Data Protection Policy			
DATE:	May 2018	CIRCULATION:	All employees, customers, service providers
REVIEW:	Annually	NOTE:	Employees should refer to Employee Handbook for information on the type of data the Company retain on them and guidance notes on privacy and data protection.
REVISION No.	DATE:	DETAILS:	
1	June 2019		
2	March 2021		
3	June 2022		

END

APPENDIX A: DATA PROTECTION PRINCIPLES

The Data Protection Principles

The following key principles are enshrined in the Irish legislation and are fundamental to Allwood Treecare Ltd's Data Protection policy.

In its capacity as Data Controller, Allwood Treecare Ltd ensures that all data shall:

1. ... be obtained and processed fairly and lawfully.

For data to be obtained fairly, the data subject will, at the time the data are being collected, be made aware of:

- The identity of the Data Controller (Allwood Treecare Ltd)
- The purpose(s) for which the data is being collected
- The person(s) to whom the data may be disclosed by the Data Controller
- Any other information that is necessary so that the processing may be fair.

Allwood Treecare Ltd will meet this obligation in the following way.

- Where possible, the informed consent of the Data Subject will be sought before their data is processed;
- Where it is not possible to seek consent, Allwood Treecare Ltd will ensure that collection of the data is justified under one of the other lawful processing conditions – legal obligation, contractual necessity, etc.;
- Where Allwood Treecare Ltd intends to record activity on CCTV or video, a notice will be posted in full view;
- Processing of the personal data will be carried out only as part of Allwood Treecare Ltd's lawful activities, and Allwood Treecare Ltd will safeguard the rights and freedoms of the Data Subject;
- The Data Subject's data will not be disclosed to a third party other than to a party contracted to Allwood Treecare Ltd and operating on its behalf.

2. be obtained only for one or more specified, legitimate purposes.

Allwood Treecare Ltd will obtain data for purposes which are specific, lawful and clearly stated. A Data Subject will have the right to question the purpose(s) for which Allwood Treecare Ltd holds their data, and Allwood Treecare Ltd will be able to clearly state that purpose or purposes.

3. not be further processed in a manner incompatible with the specified purpose(s).

Any use of the data by Allwood Treecare Ltd will be compatible with the purposes for which the data was acquired.

4. be kept safe and secure.

Allwood Treecare Ltd will employ high standards of security in order to protect the personal data under its care. Appropriate security measures will be taken to protect against unauthorised access to, or alteration, destruction or disclosure of any personal data held by Allwood Treecare Ltd in its capacity as Data Controller.

Access to and management of staff and customer records is limited to those staff members who have appropriate authorisation and password access.

5. ... be kept accurate, complete and up-to-date where necessary.

Allwood Treecare Ltd will:



- ensure that administrative and IT validation processes are in place to conduct regular assessments of data accuracy;
 - conduct periodic reviews and audits to ensure that relevant data is kept accurate and up-to-date. Allwood Treecare Ltd conducts a review of sample data every six months to ensure accuracy; Staff contact details and details on next-of-kin are reviewed and updated every two years.
 - conduct regular assessments in order to establish the need to keep certain Personal Data.
6. *... be adequate, relevant and not excessive in relation to the purpose(s) for which the data were collected and processed.*

Allwood Treecare Ltd will ensure that the data it processes in relation to Data Subjects are relevant to the purposes for which those data are collected. Data which are not relevant to such processing will not be acquired or maintained.

7. *... not be kept for longer than is necessary to satisfy the specified purpose(s).*

Allwood Treecare Ltd has identified an extensive matrix of data categories, with reference to the appropriate data retention period for each category. The matrix applies to data in both a manual and automated format.

Once the respective retention period has elapsed, Allwood Treecare Ltd undertakes to destroy, erase or otherwise put this data beyond use.

8. *... be managed and stored in such a manner that, in the event a Data Subject submits a valid Subject Access Request seeking a copy of their Personal Data, this data can be readily retrieved and provided to them.*



APPENDIX B: DATA PROTECTION KEY DEFINITIONS

Definitions

For the avoidance of doubt, and for consistency in terminology, the following definitions will apply within this Policy.

Data	This includes both automated and manual data. Automated data means data held on computer, or stored with the intention that it is processed on computer. Manual data means data that is processed as part of a relevant filing system, or which is stored with the intention that it forms part of a relevant filing system.
Personal Data	Information which relates to a living individual, who can be identified either directly from that data, or indirectly in conjunction with other data which is likely to come into the legitimate possession of the Data Controller. (If in doubt, Allwood Treecare Ltd refers to the definition issued by the Article 29 Working Party, and updated from time to time.)
Sensitive Personal Data	A particular category of Personal data, relating to: Racial or Ethnic Origin, Political Opinions, Religious, Ideological or Philosophical beliefs, Trade Union membership, Information relating to mental or physical health, information in relation to one's Sexual Orientation, information in relation to commission of a crime and information relating to conviction for a criminal offence.
Data Controller	A person or entity who, either alone or with others, controls the content and use of Personal Data by determining the purposes and means by which that Personal Data is processed.
Data Subject	A living individual who is the subject of the Personal Data, i.e. to whom the data relates either directly or indirectly.
Data Processor	A person or entity who processes Personal Data on behalf of a Data Controller on the basis of a formal, written contract, but who is not an employee of the Data Controller, processing such Data in the course of his/her employment.
Data Protection Officer	A person appointed by Allwood Treecare Ltd to monitor compliance with the appropriate Data Protection legislation, to deal with Subject Access Requests, and to respond to Data Protection queries from staff members and service recipients
Relevant Filing System	Any set of information in relation to living individuals which is not processed by means of equipment operating automatically (computers), and that is structured, either by reference to individuals, or by reference to criteria relating to individuals, in such a manner that specific information relating to an individual is readily retrievable.



APPENDIX C: SUBJECT ACCESS REQUEST FORM

Data Subject Access Request Form

Full Name (Capitals):

Postal Address:

Postcode:

Telephone:

Email:

I (name) wish to make an access request under Article 15 of the General Data Protection Regulation for a copy of any information, in particular those data specified below, that your organisation keeps about me, either on computer or in manual form.

Please describe the personal data which is required in as much detail as possible:

**Specific
Data:**

**Specific
Data:**

**Specific
Data:**



I enclose the following additional information which could help to process the request as quickly as possible:

.....

.....

.....

.....

.....

.....

Please indicate if you will be happy to merely view the data or if you would like a copy of the data in accordance with Article 20 of the General Data Protection Regulation 2018.

View data only ☐

Copy required ☐

Signature: _____ Date: _____

Print name _____

Please submit:

- A copy of official identification (which includes your photo), to verify your identity e.g. driving licence or passport along with this form.
- A recent bill from a utility company as proof of address.

Please return this form to:

The Data Controller,
Allwood Treecare Ltd,
Kinnity
Birr,
Co. Offaly.

Alternatively, you can email a copy to gdpr@allwoodtreecare.ie

