



MJFT Data Protection Policy GDPR

Prepared By	Nicola Flood
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1 Data Protection Policy

1.1 Purpose of Document

This document outlines the procedures and policies as in operation in MJ Flood Technology related to Data Protection.

The MJ Flood Technology Data Protection Policy refers to our commitment to treat information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality.

With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

This document will be updated with any changes in the requirements. This document is held centrally on the MJ Flood technology GDPR Teams Site.

1.2 Scope

This policy refers to all parties (employees, contractors, job candidates, customers, suppliers etc...) who provide any amount of data to use.

1.3 Whose data do we process?

As a Data Controller, we process Personal Data of the following groups of people:

- Employees, ex-employees and potential employees
- Visitors to our places of work
- Individuals in our customers' organisations
- Individuals in our suppliers' organisations
- Contractors
- Callers to our telephone systems
- Individuals who log Incidents/ Service Requests on our Case Management system
- People who give us business cards
- People included on purchased marketing lists
- Customers - When we are the Data Controller, we process information obtained directly from our customers such as name, address, billing information, and some employee contact information.

As a Data Processor:

- MJ Flood Technology provides services to clients which include the processing of Personal Data relating to the client, the client's staff or the client's customers. In these cases, the client is the Data Controller and we are the Data Processor. As Data Processor, we process the Personal Data on behalf of the Data Controller and under their instructions, as agreed in our contract.
- We may also process Personal Data as a Sub-Processor. This means that we have been engaged by the Data Processor to process Personal Data under their instructions as part of the role of delivering services to the Data Processor, as agreed in our contract.
- When we are a Processor, we process information in accordance with the instructions that we have in the contract or service order. When we provide a service, the data is classified and handled in

accordance with the terms of the contract or the order for those services. The data processed by the service provided, or processed to provide the service, is known as Services Data.

- When we are a Data Processor the privacy policy for the services data will be included in the service and contract documentation.

1.4 What Personal Data do we hold?

- From our websites

Individuals can contact us using functions provided on our website and we capture personal information (for example email addresses, names, address, job title) in connection with that communication.

- From our sales order processing systems

Business contact information, billing details, order details.

- From our customers

Customers provide us with lists of authorised business contacts for the functions we are contracted to provide.

- From third party marketing companies (i.e. purchased marketing lists or provided to us by our business partners

Business contact details.

- From suppliers, partners and contractors where it is necessary to provide their contracted services

Names contact details and previous experience of employees and specialists involved in delivering the services.

- From events, conferences and exhibitions we attend, either from personal contact or from the organisers and promoters (e.g. business cards and attendee lists)

Business contact details.

- From details provided to us by individuals

Business cards

Telephone calls

Correspondence

CV's.

- From our CCTV.
- From potential employees or recruitment companies, during the recruiting process.
- When people log in as "Guest" to our WIFI networks.
- When people sign in to our visitor's books.
- From our staff, for employment reasons.
- From our staff, for security purposes.

- Investigations following an incident e.g. security and or health and safety.
- Lists of people who are or have attended networking events, usually from organiser / promoter.

1.5 Why do we process Personal Data?

We process Personal Data where it is necessary for the following purposes;

- To assist in the running of the company; including, but not limited to invoicing, billing, arranging visits and internal record keeping.
- For employment and recruitment purposes, including identifying suitable specialist's contractors for certain project.
- To fulfil our contracted relationships, provide goods and services to our customers and answer queries.
- For security and prevention of crime (CCTV).
- For Safety, Health and Environment incident monitoring and prevention.
- To market ourselves to other businesses using named individuals within those businesses, and to reply to individuals who have contacted us.
- To improve our products and services; - Using feedback provided by individuals

1.6 How long do we keep the data for?

We keep Personal Data for no longer than it is needed, and in accordance with our Data Retention Policy.

Examples of this might be:

- For as long as your account is active
- As needed to provide you with products or services
- As needed for the purposes outlined in this Policy or at the time of collection
- As necessary to comply with our legal obligations.
- Resolve disputes, and enforce our agreements
- or to the extent permitted or required by law.

At the end of the retention period, we will delete your Personal Data in a manner designed to ensure that it cannot be reconstructed or read.

1.7 Who will we share data with?

In the running of our business, MJ Flood Technology sometimes work closely with other organisations. Your personal information may be passed to one of these organisations when required to perform the service. However, MJ Flood Technology will still be responsible for your information, its security and what happens to it.

In addition to this, we may be required by law to share your information with some of these organisations. Typically, depending on the circumstances, we share information with the following types of organisations;

- Contracted third parties where the information shared is necessary to provide the service
- Law enforcement agencies such as the Police, and Fire and Rescue Service

- Other government / regulatory agencies as required by law
- Our external auditors

1.8 Personal Data processed by 3rd Parties

Where we have contracted Personal Data processing to a third party, we have contracts in place with our Data Processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

1.9 Security

Security of our or our clients' IT systems is of paramount importance. We owe a duty to all of our customers/clients to ensure that all of our business transactions are kept confidential.

We are committed to the security of all Personal Data and have various policies and tools in place to ensure the physical, administrative and technical security of all data in our care, which includes Personal Data. We use security practices and operating procedures that are compliant with standard industry practices or other practices as defined in the relevant service description or contract document (as applicable).

MJ Flood Technology keep all confidential information secure, and only use it only for the purposes intended and do not disclose it to any unauthorised third party.

We also require that our third-party partners and suppliers protect any Personal Data that they process from unauthorised use, alteration, loss and disclosure.

All third-party partners and suppliers are required to submit a copy of their GDPR compliance statement and policies.

1.10 Access to personal Information

Individuals can find out if we hold any personal information about them by contacting MJ Flood Technology Data Protection Officer on dataprotection@mjf.ie

If we do hold information about you, we will;

- Give you a description of it
- Tell you why we are holding it
- Tell you who it could be disclosed to
- Let you have a copy of the information in an intelligible form.

To make a request for any personal information we may hold you need to put the request in writing using the email address dataprotection@mjf.ie.

1.11 Complaints or Queries

We aim to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our

attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

If you want to make a complaint about the way we have processed your personal information, you can request a formal internal investigation by contacting dataprotection@mjf.ie. You can also contact the body that oversees Data Protection in Ireland – the Information Commissioners Office at <https://www.dataprotection.ie/docs/Contact-us/b/11.htm>

1.12 Disciplinary Consequences

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.