

INET Computer Solutions Privacy Notice

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1. Introduction

We appreciate the trust you place in us when sharing your personal data. The security of that data is very important to us. In this document, we will explain how we collect, use and protect your personal data.

We will also explain what rights you have with regards to your personal data and how you can exercise those rights.

INET Computer Solutions Ltd determines what data is collected and how this data is going to be used and how this data is protected.

Our registered office address is:

**INET Computer Solutions
Mylestown,
Killucan,
Co. Westmeath
Ireland**

If you have questions about how we process personal data, or would like to exercise your data subject rights, please email us at gdpr@inetcs.ie

2. Collection of Personal Data

We collect personal data from you for one or more of the following purposes:

- 1. To initiate and complete commercial transactions with you, or the entity that you represent, for the purchase of products and/or services;
- 2. To fulfil a contract that we have entered into with you or with the entity that you represent;
- 3. To ensure the security and safe operation of our underlying business infrastructure.
- 4. To manage any communication between you and us.

The table in Section 3 below provides more detail about the data that we collect for each of these purposes, the lawful basis for doing so, and the period for which we will retain each type of data.

3. Lawful Basis for the Processing of Personal Data

The table below describes the various forms of personal data we collect and the lawful basis for processing this data. Our business architecture, accounting and systems infrastructure and compliance organisation means that all personal data is processed on common platforms. We have processes in place to make sure that only people in our organisation who need to access your data can do so. A number of data elements are collected for multiple purposes, as the table below shows. When we process on the lawful basis of legitimate interest, we apply the following test to determine whether it is appropriate:

Data collected	Purpose for collection	Lawful basis for processing	Data shared with?	Retention period
Name, company name, physical address, email address, website address, telephone number, landline, mobile phone	Communication	Contractual fulfilment	Internally only	The lifetime of the business relationship or maximum 7 years from the date the information is collected.
Name, physical address, email address, telephone number, bank account details (for credit accounts), other medium of content delivery	To process purchase transactions for products and services with vendors, and to ensure any transaction issues can be dealt with. For accounting and taxation purposes Documentation should any contractual legal claim arise	Contractual performance Statutory obligation Legitimate interest	Internally only Internally and professional advisers Internally and professional advisers	The lifetime of the business relationship or maximum 7 years from the date the information is collected. 6 years for Revenue records from the completion of the contract
Technical information, plus any other information that may be required for this purpose	To protect our infrastructure from cyber-attack or other threats and to report and deal with any illegal acts.	Legitimate interest	Internally, forensic and other organisations /vendors with whom we might contract for this purpose.	Relevant statutes of limitation
Names, contact details, identification details	To communicate with you about any issue that you raise with us or which follows from an interaction between us.	Legitimate interest	Internally and, as necessary, with professional advisers.	Relevant statutes of limitation.

4. Storage of Personal Data

- The majority of our data is managed internally and data hosted is hosted in the EU and is accessed only by our EU-based staff.
- Our customer relationship management, marketing and accounting systems for all our businesses are on premise or EU-based.
- We use a wide range of Cloud Service Providers (CSPs) as part of our processing environment. Unless we specifically state otherwise, we are, in respect of all these CSPs, the data controller.
- Unless we specifically state otherwise all of the CSPs that we use utilise EU-located processing facilities.
- Our payment processors and banking arrangements are based in the EU.
- We ship and deliver physical products around the world; we therefore use logistics companies that are based outside the EU and operate in other countries. We have appropriate legal and security relationships with those partners.
- We operate a data retention policy in respect of all data, whether paper-based or digital and those aspects of it which relate to personal data are contained in the table at 3, above.

5. Security Measures

We have what we believe are appropriate security controls in place to protect personal data. Risk assessment, including assessing risks to the rights and freedoms of data subjects. We do not, however, have any control over what happens between your device and the boundary of our information infrastructure. You should be aware of the many information security risks that exist and take appropriate steps to safeguard your own information. We accept no liability in respect of breaches that occur beyond our sphere of control.

6. Your Rights as a Data Subject

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email gdpr@inetcs.ie or use the information supplied in the Contact us section below.

Your rights are as follows:

- **The right to be informed**
As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy policy and any related communications we may send you.
- **The right of access**
You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:
 - a) The purposes of the processing
 - b) The categories of personal data concerned
 - c) The recipients to whom the personal data has been disclosed
 - d) The retention period or envisioned retention period for that personal data
 - e) When personal data has been collected from a third party, the source of the personal data
- If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.
- **The right to rectification**
When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.
- **The right to erasure (the 'right to be forgotten')**
Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.

- **The right to restrict processing**

You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:

- a) The accuracy of the personal data is contested
- b) Processing of the personal data is unlawful
- c) We no longer need the personal data for processing but the personal data is required for part of a legal process
- d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing

- **The right to data portability**

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

- **The right to object**

You have the right to object to our processing of your data where

- Processing is based on legitimate interest;
- Processing is for the purpose of direct marketing;
- Processing is for the purposes of scientific or historic research;
- Processing involves automated decision-making and profiling.

7. Contact Us

Any comments, questions or suggestions about this privacy policy or our handling of your personal data should be emailed to gdpr@inetcs.ie

Alternatively, you can contact us at the following postal address or telephone numbers:

GDPR Compliance Manager

INET Computer Solutions Ltd, Unit 2 Forest Park Business Campus, Mullingar, Co. Westmeath, Ireland

Telephone: + 353 44 9362000

Our telephone switchboard is open 9:00 am – 5:30 pm GMT, Monday to Friday. Our switchboard team will take a message and ensure the appropriate person responds as soon as possible.

8. Complaints

Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you are entitled to escalate your complaint to a supervisory authority within the European Union.

For Ireland, this is the Information Commissioner's Office (ICO). It's contact information can be found at <https://www.dataprotection.ie>