

Privacy Notice

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Doc Type:	Data Protection	Rev No.:	4
Doc Owner:	Data Protection Team	Release Date:	September 2024
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PRIVACY NOTICE

1. Introduction

Bidvest Noonan is committed to high standards of data protection and processes all personal data in line with the applicable legislation and regulations. This Privacy Notice explains how we collect, use, disclose and safeguard your information when you:

- a. Apply for a job at Bidvest Noonan;
- b. Join Bidvest Noonan as an employee or contractor;
- c. Use our products or services;
- d. Download documents from us or subscribe for alerts or newsletters;
- e. Attend one of our events, or an event hosted at our premises;
- f. Supply your services to Bidvest Noonan as an independent contractor;
- g. Visit or use www.bidvestnoonan.ie or www.bidvestnoonan.co.uk (our “Websites”).

The contents of this Privacy Notice are subject to change from time to time. An updated copy will be uploaded on our websites.

2. Why do we collect personal data?

We collect personal data in order to operate our business; that may include collecting personal information to recruit and employee staff, provide our services to our clients, engage with members of the public, communicate with regulators and relevant authorities, obtain services and products from third party providers, provide access to our websites and our platforms.

3. What types of personal data do we collect?

The types of personal data we collect and process include:

- Information contained in your CV or job application such as your name, address, educational details, private and corporate e-mail address and phone number.
- Information contained in any documents that you send to any of us for identity verification purposes, such as your passport or driving licence.
- Compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom or in the Republic of Ireland.
- Bank account details and financial information.
- Information that you provide about yourself when entering into a contract with us such as PPS number, next of kin details, medical and health questionnaires or assessments, DBS or Garda screening documentation.
- Information contained in insurance claim forms.
- Location tracking on company owned vehicles.
- Recording of phone calls in some cases.
- CCTV Images and Videos.
- Biometric data processing.

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- Invoicing and billing information.
- Marketing information.
- Website usage information.

4. Why do we need to collect your personal data?

We collect and process personal information, to provide our services to our clients, to recruit our staff, to safeguard our staff and our premises and to improve our website and your experience while using it.

We need to process this information for the following reasons:

- To process your application to work at Bidvest Noonan.
- To comply with applicable employment legislation and our contractual obligations.
- To keep our employees and our properties safe.
- To defend ourselves and our staff in case a claim is made against Bidvest Noonan.
- To assist our staff to access sites, clock in/out quickly and efficiently and eliminate payroll errors.
- To reimburse independent contractors for their services.
- To keep you up to date on industry news, give you the option to provide feedback to Bidvest Noonan and contact us.
- To understand how you interact with our website and our services, which helps us improve your user experience.

5. What are the legal bases for processing these data?

In line with Article 6 GDPR, we rely on the following legal bases for processing the data:

- We have obtained prior consent to process personal data for specific purposes.
- The processing is necessary for the performance of the contract of employment or the contract with our clients.
- The processing is necessary to comply with a legal obligation.
- The processing is necessary for our legitimate interests, except where our interests are overridden by the interests of fundamental rights and freedoms of data subjects.

6. How do we share your information and with what third parties?

Bidvest Noonan may share your personal data with the following third parties, in order to comply with our obligations as an employer or to provide services to you:

- Service providers, such as banking partners, IT service partners, cloud service providers.
- Our clients.
- Legal firms, consultants, regulators or external advisors.
- Third parties who enable the completion of pre-employment screening checks.

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- Insurance companies.
- Business partners and companies within the wider Bidvest Group.

7. Why do we need to share your information with third parties?

The reasons we transfer your personal data to third parties may include the following:

- Issuing payslips, banking and postal services.
- Location tracking and management of company owned vehicles.
- Managing timekeeping records.
- Compliance with our contractual obligations with our clients.
- Provision of pension and health insurance.
- Insuring and claims handling.
- Obtaining advice from legal firms, consultants for employment-related matters.
- Disclosing information to regulators and other authorities, when required by law.
- Completion of pre-employment screening checks e.g. DBS, Garda vetting.

Where the third party is a data controller, they have the same obligations under Data Protection law to protect your data, as we do.

Where the third party is a data processor, we require that these third parties provide a sufficient guarantee that the necessary safeguards and controls have been implemented to ensure there is no impact on your data rights and freedoms.

8. How do we protect your information?

We take data security seriously and we implement a variety of technical and organisational measures to protect your personal information. We ensure a level of security that is appropriate to the risks to your rights and freedoms. Our technical and organisational measures include encryption, access controls, regular monitoring of our systems for possible vulnerabilities, data minimisation etc.

We are also accredited with the ISO 27001 Certification on Information Security.

9. Do we transfer your personal data outside the EEA/UK?

Bidvest Noonan or our service providers may transfer your personal data to countries outside the European Economic Area (EEA) or the United Kingdom (UK). When these transfers happen, we ensure that appropriate safeguards are in place to protect your personal data. These safeguards may include the use of standard contractual clauses approved by the European Commission, ensuring that the country has an adequate level of data protection as determined by the European Commission, or other legally accepted mechanisms.

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10. How long do we keep your data?

We retain appropriate records of your personal information to comply with our legal and regulatory obligations.

We have implemented appropriate technical and organisational measures to ensure your personal information is securely stored. When determining the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process your data, and whether we can achieve those purposes through other means, as well as the applicable legal requirements.

11. What are your Data Protection rights?

The General Data Protection Regulations (GDPR) give you several rights that you can exercise at any time:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances, you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply, you have the right to request us to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing, under certain conditions.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling, where applicable.
- If our processing is based on your consent, you have the right to withdraw your consent at any time.

To exercise these rights, contact the Data Protection team at data.protection@bidvestnoonan.com

12. How can you make a complaint about the processing of your personal data?

In the event that you wish to make a complaint about how your personal data is being processed by Bidvest Noonan, or how your complaint has been handled, you have the right to lodge a complaint directly with Bidvest Noonan's Data Protection Officer and/or the relevant supervisory authority.

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The details for each of these contacts are:

The Data Protection Officer

Bidvest Noonan (ROI) Limited
 Unit 3, Hilton House
 Swords Business Park
 Swords Co. Dublin
 K67 X971
 Data.Protection@bidvestnoonan.com

	Supervisory authority contact details Republic of Ireland		Data Protection Officer contact details United Kingdom
Contact Name:	Data Protection Commissioner		Information Commissioner’s Office
Address line 1:	21 Fitzwilliam Square South	Canal House, Station Road	Wycliffe House
Address line 2:	Dublin 2	Portarlinton	Water Lane
Address line 3:	Co. Dublin	Co. Laois	Wilmslow
Address line 4:	D02 RD28	R32 AP23	Cheshire
Address line 5:			SK9 5AF
Email/website:	How to contact us Data Protection Commissioner		https://ico.org.uk/global/contact-us/
Telephone:	01 7650100 / 1800437 737		0303 123 1113

A current version of this document is available to all stakeholders and members of staff on the Bidvest Noonan website and a link to it is provided on our corporate email.

13. Changes to this Privacy Notice

We may update this Privacy Notice from time to time in order to reflect, for example, changes to our practices or for other operational, legal, or regulatory reasons. We will notify you of any changes by posting the new Privacy Notice on our website. You are advised to review this Privacy Notice periodically for any changes.

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Cookie Policy

What are cookies?

Cookies are small text files that may be stored on your computer or mobile device by websites that you visit. When you visit our website, you will be prompted to accept or refuse cookies. Some cookies are strictly necessary for the use of the website, such as the ones used to record your consent. Other cookies will be used to enhance your experience or to establish statistics about the browsing experience on our website.

Why do we use cookies?

We use cookies to ensure that our website is functional and secure, enhance your experience on our website and understand how our website is used. We use Plausible Analytics, a privacy-friendly analytics tool, to track and report website traffic.

Types of Cookies we use:

Strictly necessary cookies/Functional: These are cookies that are required for the operation of our website, for example these cookies enable our website administrators to log in and manage our website's content.

Security cookies: these cookies are used to enhance security and protect user data, such as login credentials and session identifiers.

Analytical cookies: We do not use analytical cookies on our websites. We use Plausible Analytics to collect information about how visitors use our websites. Plausible Analytics do not use cookies to track individual users across websites. Instead, they aggregate data to help us understand website traffic and usage patterns.

Your choices regarding cookies

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. Please note that disabling some cookies may affect the functionality of our website.

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How can you manage cookies?

You can delete all cookies that are already on your device by clearing the browsing history of your browser. This will remove all cookies from all websites you have visited. Be aware that you may also lose some saved information (e.g. saved login details etc). For more details, see aboutcookies.org

Changes to this Cookie Policy

We may update this Cookie Policy from time to time to reflect changes in our practices or for other operational, legal, or regulatory reasons. We encourage you to review this policy periodically to stay informed about how we use cookies.