Privacy Notice



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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. Communicate with Bidvest Noonan to provide feedback or information about our services – or to make enquiries or complaints.

e. Download documents from us or subscribe for alerts or newsletters.

f. Attend one of our events, or an event hosted at our premises.

g. Supply your services to Bidvest Noonan as an independent contractor.

h. Visit or use **www.bidvestnoonan.ie** or **www.bidvestnoonan.co.uk** or **www.bidvestnoonan.com** (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 and Need Your Personal Data?

We collect and process personal data to operate our business effectively, provide services to our customers, and ensure the safety and efficiency of our operations.

This includes:

- Recruiting and employing staff, including processing job applications and complying with employment legislation.
- Delivering our services to customers and engaging with members of the public.
- Safeguarding our employees, premises, vehicles, systems and assets.
- Managing incidents, complaints, accidents, insurance matters, disputes and the establishment, exercise or defence of legal claims
- Facilitating staff access to sites, managing timekeeping, rostering, attendance and absence records, and reducing payroll errors.
- Reimbursing independent contractors for their services.
- Communicating with regulators, relevant authorities, and third-party service providers.
- Keeping you informed about industry news, collecting feedback, and responding to inquiries.
- Providing and improving access to our websites and platforms and enhancing your user experience through analytics.

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 NI or PPS number, next of kin details, medical and health questionnaires or assessments, AccessNI, DBS or Garda screening documentation.
- Information contained in insurance claim forms.
- Location tracking on company owned vehicles, including vehicle location and vehicle behaviour data.



- Recording of phone calls in some cases, including call recordings and call metadata.
- CCTV Images and Videos, including footage captured at Bidvest Noonan's premises, operational sites and customer sites, where applicable.
- Biometric information where used.
- Access control and employee identification card information, including employee number, photograph and access records.
- Time and attendance, rostering, shift, absence and training records.
- IT and communications security information, including email security information, systems access records, device, endpoint, network and security logs.
- Records relating to incidents, complaints, accidents, investigations and insurance or legal proceedings.
- Invoicing and billing information.
- Marketing information.
- Website usage information.

4 – 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 customers.
- 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. This may include protecting our employees, premises, vehicles, systems and assets; managing workforce deployment, timekeeping, attendance and absence; preventing and detecting crime, fraud or misuse of systems; investigating incidents, complaints, accidents or security events; and managing insurance matters, disputes and legal claims.

Where monitoring or operational records include special category personal data, for example health information recorded as part of absence management, incident reporting or occupational health processes, we will only process that data where an additional Article 9 GDPR/UK GDPR condition applies.

Where records include criminal offence data, such as information relating to vetting, security incidents or law enforcement requests, we will only process that data where permitted by applicable data protection law.

5 - How do we share your information?

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, telephony and call recording providers, fleet and vehicle tracking providers, HR, payroll, rostering, time and attendance and training system providers.
- Our customers - where necessary to provide services, manage operational matters, respond to incidents or meet contractual requirements.
- Legal firms, consultants, regulators, auditors or external advisors.
- Third parties who enable the completion of pre-employment screening checks.
- Business partners and companies within the wider Bidvest Group, where necessary for internal administration or service delivery.
- Insurance companies.

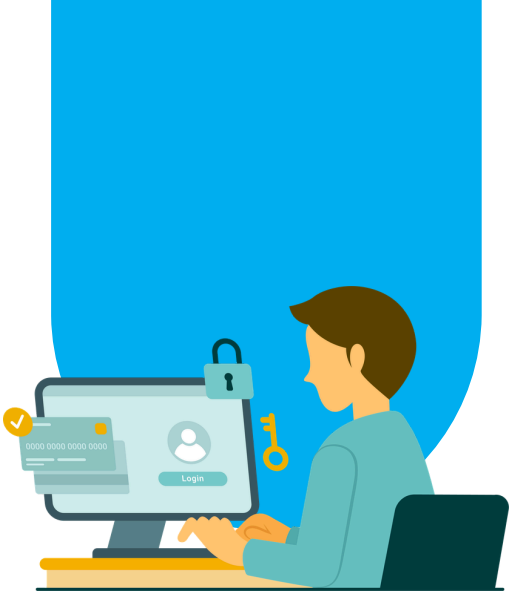
6 - Why Do We Need to Share Your Information with Third Parties?

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

- Recruiting and workforce management services.
- Issuing payslips, banking and postal services.
- Management of company owned vehicles, including location tracking, vehicle behaviour data, driver licence checks, vehicle check records, fines, accident reporting and fleet administration.
- Managing timekeeping, rostering, attendance, absence and payroll-related records.
- Supporting operational oversight and monitoring activities, including CCTV, access control and employee identification card management, call recording, IT and communications security monitoring, email and endpoint security and training compliance.
- Managing incidents, complaints, investigations, health and safety reporting.
- Compliance with our contractual obligations with our customers.
- 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. AccessNI, 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.



7 - 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 and secure retention practices. We are accredited with the ISO 27001 Certification on Information Security and the Cyber Essentials Certification.

8 - 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 reliance on an adequacy decision adopted by the European Commission or, where applicable, the UK Government, the use of standard contractual clauses approved by the European Commission and/or the UK International Data Transfer Agreement or Addendum, or other transfer mechanisms permitted under applicable data protection law.

9 - 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. Retention periods may vary depending on the type of record and applicable legal, regulatory, contractual or operational requirements.

When we no longer need your personal information, we will securely delete or anonymise it.

10 - 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 have rights in relation to decisions based solely on automated processing, including profiling, where these produce legal or similarly significant effects on you.

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**

11 - Do We Use Automated Decision-Making or Profiling?

We do not use automated decision-making or profiling that produces legal effects or similarly significant effects on you. If we do so in the future, we will inform you and provide you with the opportunity to object.



12 - How Can You Make a Complaint About the Processing of Your Personal Data?

If 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.

Bidvest Noonan's Data Protection Officer:

Role:	Details
Data Protection Officer:	Olga Mitropoulou
Address:	Airside Green, Lakeview Drive, Airside Business Park, Swords. Dublin. K67 Y7W9
Email:	Data.Protection@bidvestnoonan.com

Supervisory Authorities ROI & UK:

	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	Portarlington	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

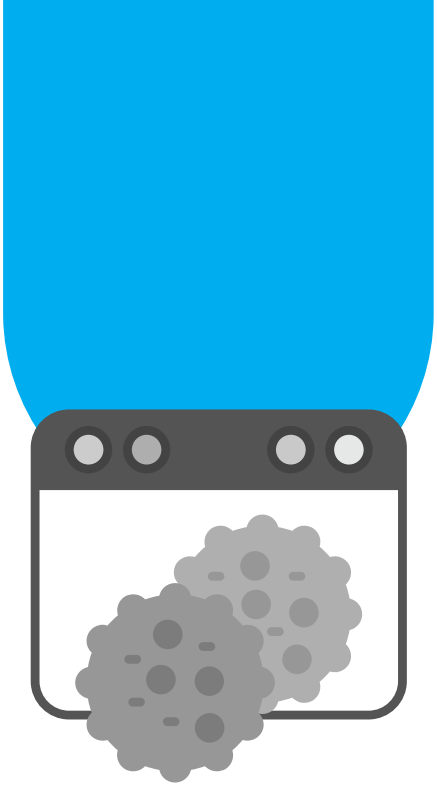
A current version of this document is available to all stakeholders and members of staff on the Bidvest Noonan website and a link to it is provided on our corporate email.

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.

When this Privacy Notice is updated, Bidvest Noonan will consider whether any corresponding updates are required to be made to its Record of Processing Activities (RoPA). This helps ensure that this Privacy Notice and Bidvest Noonan's RoPA remain consistent and accurately reflect current processing activities.

14 -Cookie Policy



14.1 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.

14.2. 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.

14.3. 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.

14.4. 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**

14.5. 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.

