

## 1.0 Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

## 2.0 Responsibilities

**2.1** The GDPR Owner is responsible for ensuring that this notice is made available to data subjects prior to Datapac's collecting/processing their personal data.

**2.2** All Datapac team members who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

## 3.0 Privacy notice

At Datapac we are committed to protecting your privacy. We are committed to preserving the confidentiality, integrity and accessibility of internal and customer information assets in delivery of services by Datapac. This is in order to ensure that the products and services we provide fully conform to both customer, legal and regulatory requirements and in order to preserve our competitive edge, cash flow, profitability and commercial image. Information and information security requirements will be continually aligned with Datapac's goals and various service management systems are in place as enabling mechanisms for information sharing, for electronic operations and for reducing information-related risks to acceptable levels.

Our GDPR Owner and data protection representatives can be contacted directly here:

Email: [dataprotection@datapac.com](mailto:dataprotection@datapac.com)

The personal data we collect from/process on you is as follows:

Personal data type:
Name
Address
Email Address
Telephone No.
Public IP Addresses

The personal data we collect will be used for the following purposes:

- To contact you if we are to respond to any communication you might send to us
- To process any orders from you and arrange relevant deliveries
- To pass onto our third-party couriers in order to fulfil the delivery of your order.
- For marketing promotions
- To meet our contractual obligations

**3.1** The purpose and legal basis for processing your information:

- We collect your personal information to enter into a contract with you to sell ICT solutions/services. It is a requirement of the contract that we enter into with you that you provide all personal information requested in order for us to fulfil our contract e.g. we may not be able to call you to advise stock availability or deal with a service issue.
- In order to process your personal information for this purpose, the processing is necessary for the performance of a contract to which you are a party.
- We may use your personal information for direct marketing purposes to make you aware of products and services which may interest you or for customer satisfaction surveys where you have not objected to us doing so. As part of our marketing activities. We may do this by phone, post, email, text or through other digital media. Where we do so we rely on the lawful processing ground of legitimate interest and our legitimate interest is to develop relationships with our existing customers and to assess our performance and standards.
- We may also use your personal information to manage our everyday business needs, including accounting and to prevent fraud. Where we do so we rely on the lawful processing ground of legitimate interest and our legitimate interest is in the effective management of our business.

**3.2** Any legitimate interests pursued by us, or third parties we use, are as follows:

- Third Party Service Providers: We may share your personal information with third party service providers that perform services and functions at our direction and on our behalf such as our accountants, IT service providers, printers, lawyers and other business advisors, marketing companies who carry out marketing campaigns on our behalf and providers of security and administration services.
- An Gardaí, Government Bodies or officials: We may share your personal information with an Gardaí or other government bodies or agencies where required to do so by law.

### 3.3 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Datapac to process personal data, but it must be explicitly given. Where we are asking you for sensitive personal data, we will always tell you why and how the information will be used.

You may withdraw consent at any time by emailing us at [dataprotection@datapac.com](mailto:dataprotection@datapac.com) as per our documented Withdrawal of Consent Procedure.

### 3.4 Disclosure

Datapac may pass on your personal data to third parties for legitimate business processing reasons in order to service your contract.

### 3.5 Retention period

Datapac will process personal data for the duration of our contractual relationship and will store the personal data for the period of 7 years from the date of completion of this contract or from the end date of any warranty period. We may hold it for a longer period of legally required.

### 3.6 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- 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 to have a right 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 such as direct marketing.

- 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.
- Right to judicial review: if Datapac refuses your request under rights of access, we will provide you with a reason as to why. All the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

#### 4.0 Document Owner and Approval

The GDPR owner is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above

A current version of this document is available to all Datapac team members on SharePoint.

This document was approved by Senior Management on date of first approval as recorded on SharePoint and is issued on a version-controlled basis.

#### 5.0 Change History Record

Revision	Revised By	Date	Changes
1	Munyaradzi O’Keeffe	14/05/2018	Created and approved.
2	Munyaradzi O’Keeffe	06/12/2019	Reviewed and updated
3	ISMB	13/02/2020	Reviewed and updated
4	ISMB	09/11/2021	Reviewed.
5	ISMB	09/05/2022	Reviewed