



Privacy Policy

RSL Ireland Ltd & Refrigeration Products (1999) Ltd

At RSL group we are very aware of the importance of managing the personal data that we hold, whether that is from a customer, a supplier or an employee. We take our privacy and data protection obligations very seriously, and a key part of that right now is ensuring that we align all our data practices with the new requirements of General Data Protection Regulation (GDPR) by May 2018. We are fully committed to doing so and working hard to make this happen. We're also very conscious that things don't stop in May 2018. We are actively involved in looking to ensure that privacy concerns continue to be built into our business practices and procedures.

This document addresses the following areas: • GDPR Awareness at RSL Ireland Ltd

Data Inventory – what data do we hold?

What we do with the data

How we store the data

Notices and Consent to transfer

How we deal with your data protection rights

How we comply with the data protection rules

RSL Ireland Ltd has been subject to and respectful of its data protection obligations under existing law, and will continue to be so leading up to and beyond May 25th 2018. The protection of our customer and employee data has always been a priority for our directors.

We have appointed an internal data protection officer (Deborah Roche) to manage the process and ensure we are compliant with the new regulations going forward.

As part of our GDPR transformation program, we have been undertaking a thorough audit of all the personal data we hold throughout the organization and have been conducting a 'gap analysis' of GDPR requirements against an assurance framework and mapping this against all activities in the group. As part of this we have deleted all old database information we held on our servers within IBM Lotus notes.

We are investing in the creation of robust and sustainable processes to support a strong, long-term GDPR compliance framework. RSL Ireland Ltd is based in Ireland, but we do have customers and suppliers outside of Ireland. Where we are engaged in cross border data transfers from customers located in the European Economic Area (EEA), we will ensure that we continue to follow appropriate practices and follow one or more of the approved means of protecting personal data that leaves the EU.

Data Inventory & what we hold

The first category of personal data that we process as a data processor is data belonging to our customer.

The customer data that we process falls into several categories as follows;

Company Name, including staff names

Customer Address

Customer phone number

Customer email accounts

Customer Sales History

We store all of the above to process customer's daily requirements; all information gained was given at conception of the relationship between our customer and our selves.

The second category of personal data that we process is data belonging to our staff.

Name

Address

Bank Details

Email address

Contract of employment

All of the above information is stored for the purpose it was given for.

The third category of data we process is data belonging to our suppliers.

The data used for suppliers is processed as follows;

Supplier Name, including staff names

Supplier Address

Supplier phone number

Supplier email accounts

Supplier Bank account details

Supplier transactional history

What do we do with it, why and for how long?

We use it for the sole purpose it was intended for. We will retain information no longer than is necessary for the purposes for which the data was collected and processed

How do we store it ?

We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction or damage. The data is stored and protected by password protected software, which is accessed by company directors only.

Your Data Protection rights

Under certain circumstances, by law you have the right to:

Request information about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.

Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

Object to automated decision-making including profiling, that is not to be subject of any automated decision-making by us using your personal information or profiling of you.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request transfer of your personal information in an electronic and structured form to you or to another party (commonly known as a right to "data portability"). This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.

Withdraw consent. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific

processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Changes to Privacy Policy

Our Privacy Policy may change from time to time and any changes to the statement will be communicated to you by way of an e-mail or a notice on our website.

