

## **North Cork Electrical Ltd Privacy Notice**

North Cork Electrical is a renewable energy and electrical contracting solutions provider, with our solutions being deployed across multiple markets and sectors. Our team has extensive experience in the provision of solar pv, electrical vehicle charging, energy monitoring and electrical contracting services. We strive to offer the very best service possible.

Processing personal data in a secure, fair, and transparent way is extremely important to us . We know that your privacy is important to you and this notice explains how we collect and use your information, who we share it with and your legal rights.

This notice applies to our use of your information in connection with the provision of our services and all our related website, domains, and apps that may be accessed by our customers, community partners, employees and suppliers (collectively the “Services”).

### **WHO WE ARE**

North Cork Electrical Ltd (“North Cork Electrical”, “we”, “us” or “our”) is the provider of the Services and is data controller for your information.

### **SCOPE**

This Privacy Policy is effective from 18<sup>th</sup> March 2022. If you are a customer of North Cork Electrical Ltd or you are just browsing our website, this policy applies to you.

### **OUR RESPONSIBILITY**

If you are a visitor to our website we act as the ‘data controller’ of personal data. This means we determine why and how your personal data is processed.

### **WHO THIS NOTICE APPLIES TO**

We collect and process information relating to individuals using the Services, including customers, employers, community partners and others.

### **YOUR RESPONSIBILITIES**

Read this Privacy Notice to understand your rights and how we process your personal data.

If you are a customer, please also check the contracts and/or agreements between us: they may contain further details on how we collect and process your data.

If you provide us with personal information about other people, or if others give us your information, we will only use that information for the specific reason for which it was provided to us. By submitting the information, you confirm that you have the right to authorise us to process it on your behalf in accordance with this Privacy Notice.

### **INFORMATION WE COLLECT AND HOW WE GET IT**

We collect the following types of information from you in order to provide you with information on North Cork Electrical solutions and services, job application, or register you for our news alerts.

Type of data	Description
Personal details	Your name, contact number, email address
Organisation details	Your organisation name, address, contact number, email address, website
Career details	Your education details, work experience
Data that identifies you	Your IP address, geolocation information about where you might be
Data on how you use our website	Your URL clickstreams, pages viewed, page response times, how long you stay on our pages, what you do on those pages and how often

Data protection legislation requires that we can use your data only for certain reasons and where we have a legal basis to do so. Here are the reasons for which we process your data:

Activity	Lawful bases	Description
Product & Service Delivery	Contract	Engaging with you to deliver North Cork Electrical products and services.
Customer Support	Contract	Notifying you of any changes to North Cork Electrical products and services, answering queries or solving issues via telephone support, phone or email.
Marketing	Contract & Consent	Sending you updates, invites and marketing materials relating to the Services. If we do so, we will also collect information on your interaction with such communications.
Financial	Contract	Processing your data for taking payment, issuing invoices, etc.
Human Resources	Contract	Engaging with you regarding your employment with our business.
Financial	Contract	Processing your data for wages or salary payment.
Service Improvement & Development	Contract & Legitimate Interests	Processing your information in order to improve our Services and for business planning purposes. We may also process your information in order to develop new products and services.
Safety & Security	Contract & Legitimate Interests	Processing your information as necessary to ensure we offer safe and secure Services, including to detect and prevent fraudulent and other illegal behaviour.
Legal & Regulatory	Legitimate Interests	Processing your information as required (a) for compliance with our legal and regulatory obligations (b) to detect, investigate, prevent, and address fraud and other illegal activity, security, or technical

		<p>issues; (c) to protect our rights, property, or safety; (d) to enforce any contracts we have with you; (e) to prevent physical injury or other harm to any person or entity, including you and members of the public; and (f) for regulatory compliance and investigations.</p>
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If you visit any of our websites or use our apps, we will collect certain information relating to you. Generally, unless you submit information to us, such as via an online form, we only collect technical and device-related information from your use of our website and apps.

### **SPECIAL CATEGORY DATA**

We do not process special category data.

### **OUR LEGAL BASES**

In order to collect, use, share, and otherwise process your information for the purposes described in this notice, we rely on a number of legal bases, some of which are mentioned above, including where:

- necessary to perform a contract we have with you, and to provide the Services;
- you have consented to the processing (in which case you may withdraw your consent at any time);
- necessary for us to comply with a legal obligation;
- necessary to protect your vital interests, or those of others;
- necessary in the public interest;
- necessary for the purposes North Cork Electrical or a third party’s legitimate interests, for example for marketing, improving or developing the Services and keeping the Services safe and secure, provided that those interests are not overridden by your interests or fundamental rights and freedoms.

### **SHARING YOUR INFORMATION**

In the course of providing the Services, we share information with various third parties such as relevant government departments and bodies, our service providers or regulators (where legally required).

We do this based upon the legal bases and exceptions mentioned in this notice for the following purposes.

- **Providing the Services:**  
We may share the information provided by you with our service providers in order to provide the Services.
- **Keeping our Services safe and secure:**  
We use your information in certain instances as necessary to pursue our and your legitimate interests of keeping some of our Services, such as our domains, websites, apps, offices and

events, safe and secure. For example, we collect IP addresses and process log files to ensure our website and apps are not subject to fraudulent access.

- **Legal and safety reasons:**

We may share your information with law enforcement, regulators and others if we have a good-faith belief that it is reasonably necessary to (a) respond, based on applicable law, to a legal request (e.g., a subpoena, search warrant, court order, or other request from government or law enforcement); (b) detect, investigate, prevent, and address fraud and other illegal activity, security, or technical issues; (c) protect our rights, property, or safety; (d) enforce any contracts we have with you; (e) prevent physical injury or other harm to any person or entity, including you and members of the public; (f) for regulatory compliance and investigations.

- **Service providers and professional advisers:**

We may share your personal information to help us provide our services and communicate with you. Categories of service providers include IT software, commissioning bodies of our services (with your consent) and hosting providers and records-storage companies. We may also share your personal information where we need advice and support from our professional advisers, such as accountants, lawyers and insurance providers. Where such third parties are processors, these third parties are contractually required to use it only to provide their service to us and are contractually barred from using it for their own purposes.

- **Business re-organisation:**

In instances where our business is subject to a re-organisation, such as a merger or acquisition of some or all of its assets, we may, in accordance with our legitimate interests, need to share information in the course of the transaction. In such circumstances, your information may be disclosed, where permitted by applicable law, in connection with a corporate restructuring, sale, or assignment of assets, merger, or other changes of control or financial status of North Cork Electrical.

## WHERE WE STORE DATA

The personal data we collect is processed at our office in Ireland, by our team members who work remotely, and in any data processing facilities operated by the third parties identified below. By submitting your personal data you agree to this transfer, storing or processing by us. If we transfer or store your information outside the EEA in this way, we will take steps to ensure that your privacy rights continue to be protected as outlined in this Privacy Notice.

Service provider	Data collected or shared	Purpose	Location of processing
Google Analytics <a href="#">privacy policy</a>	<ul style="list-style-type: none"> <li>● Personal details</li> <li>● How you use our website</li> <li>● Data that identifies you</li> <li>● Cookies</li> </ul>	Google Analytics is an all-in-one premium web analytics platform.	USA
Microsoft Office 365 <a href="#">privacy policy</a>	<ul style="list-style-type: none"> <li>● Personal details</li> </ul>	Office 365 is a web-based office productivity suite. Businesses use it to send, receive and track email communications, create documents	Ireland

		and share out documents with OneDrive.	
Dmac Media <a href="#">privacy policy</a>	<ul style="list-style-type: none"> <li>Personal details</li> </ul>	Web hosting company that provides shared, reseller, and virtual private server hosting.	
Stripe <a href="#">privacy policy</a>	<ul style="list-style-type: none"> <li>Personal details</li> <li>Financial details</li> </ul>	Online payment platform	IRL
HubSpot <a href="#">privacy policy</a>	<ul style="list-style-type: none"> <li>Personal details</li> <li>Financial details</li> </ul>	Contact relationship management platform	USA
GoProspero <a href="#">privacy policy</a>	<ul style="list-style-type: none"> <li>Personal details</li> </ul>	Online proposal generation platform	Israel

## DATA TRANSFERS

In certain cases, we need to transfer your information to recipients outside the European Economic Area (“EEA”), such as where it is necessary to provide the Services.

Where we transfer your information, we do so in accordance with EU data protection law. We only transfer personal information to these countries when it is necessary for the services we provide you, or it is necessary for the establishment, exercise or defence of legal claims or subject to safeguards that assure the protection of your information.

When North Cork Electrical engages in such transfers of personal information, it relies on i) Adequacy Decisions as adopted by European Commission on the basis of Article 45 of Regulation (EU) 2016/679 (GDPR), or ii) Standard Contractual Clauses issued by the European Commission. For more information, please visit [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en). North Cork Electrical also monitors the circumstances surrounding such transfers in order to ensure that these maintain, in practice, a level of protection that is essentially equivalent to the one guaranteed by the GDPR.

Following the Court of Justice of the European Union’s invalidation of the EU-US Privacy Shield Framework in Case C-311/18, North Cork Electrical will no longer rely on the EU-US Privacy Shield as a mechanism of international data transfer until further notice. North Cork Electrical will however remain committed to maintaining its self-certification under the EU-US Privacy Shield Principles and respect its principles, as an additional measure of protection of its users’ privacy, until further notice.

Please note that the privacy protections in some of these countries may not be the same as in your home country. We will only transfer information as permitted by law.

For further information, including obtaining a copy of the documents used to protect your information, please contact us on [data@northcorkelectrical.com](mailto:data@northcorkelectrical.com).

## RETENTION

We may retain your information for as long as necessary in light of the purposes set out in this notice, including for the purposes of satisfying any legal, accounting, or reporting requirements and,

where required for North Cork Electrical, to assert or defend against legal claims, until the end of the relevant retention period or until the claims in question have been settled.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

ITEM TYPE	DURATION TIME
Customer quotation	1 year from completion of contract
Customer records relating to provision of services	6 years from termination of contract
Employee application form	Duration of employment
Employee references received	1 year
Payroll and tax information	6 years
Employee sickness record	3 years
Employee annual leave record	2 years
Employee unpaid leave / special leave records	3 years
Annual Performance Development Review	5 years
Employee records relating to promotion / transfer / training / disciplinary	1 year from termination
Employee references given / information to enable provision of a reference	5 years from reference / termination
Employee summary of record of service	10 years from termination
Accidents / injuries at work records	12 years
Standard Operating Procedures	15 years after superseded
Order / delivery notes	Current financial year plus 1 year
Equipment / instruments / maintenance logs / records of service inspections	Lifetime of the equipment
Procurement, use, modification and supply records relevant to production of products or equipment	11 years
Homicide / Serious Untoward incident	30 years
Record of destruction of each item mentioned above	Never to be destroyed

## YOUR RIGHTS

You have a number of rights in relation to your information that we process. To exercise these rights, please contact us at [data@northcorkelectrical.com](mailto:data@northcorkelectrical.com).

While some of these rights apply generally, certain rights apply only in specific circumstances. We describe these rights below.

<b>Access:</b>	You have the right to request access to your information that we control.
<b>Data Portability:</b>	You have the right to request that some of your personal information that you initially provided to us is returned to you or another controller in a commonly used machine readable format.
<b>Rectify, Restrict and Delete:</b>	You have the right to ask us to restrict the processing of your information or to rectify or delete your information. Please note that despite a deletion request, we may continue to process your information if we have a legal basis to do so.
<b>Object:</b>	If we process your information based on our legitimate interests explained above, or in the public interest, you can object in certain circumstances. In such cases, where legally required to do so, we will cease processing your information unless we have compelling legitimate grounds to continue processing or where it is needed for legal reasons. Where we use your data for direct marketing, you can always object using the unsubscribe link in such communications or by contacting us at <a href="mailto:data@northcorkelectrical.com">data@northcorkelectrical.com</a> .
<b>Withdraw Consent:</b>	Where you have previously provided your consent, you have the right to withdraw your consent to our processing of your information at any time. For example, you can withdraw your consent to email marketing by using the unsubscribe link in such communications or contacting us at [email address]. In certain cases, we may continue to process your information after you have withdrawn consent if we have a legal basis to do so or if your withdrawal of consent was limited to certain processing activities.
<b>Complain:</b>	You have the right to submit a complaint about our use of your information with your local supervisory authority, the Data Protection Commission (Ireland).

North Cork Electrical has the right to override a data subject's request to be forgotten / erasure in certain circumstances. Below are the reasons cited in the GDPR that override the right to forgotten / erasure.

- The data being processed is necessary for public health purposes and serves in the public interest.
- The data being processed is necessary to perform preventative or occupational medicine. This only applies when the data is being processed by a health professional who is subject to a legal obligation of professional secrecy.
- The data is being used to exercise the right of freedom of expression and information.
- The data is being used to comply with a legal ruling or obligation.
- The data is being used to perform a task that is being carried out in the public interest or when exercising an organisation's official authority.
- The data represents important information that serves the public interest, scientific research, historical research, or statistical purposes and where erasure of the data would likely to impair or halt progress towards the achievement that was the goal of the processing.
- The data is being used for the establishment of a legal defence or in the exercise of other legal claims.

You have the right to lodge a complaint regarding our use of your data. Please tell us first, so we have a chance to address your concerns. If we fail in this, you can address any complaint to the Data Protection Commission (Ireland)). The details are listed below:

#### **The Data Protection Commission (Ireland)**

Commissioner: Helen Dixon  
Postal Address: Canal House, Station Road, Portarlinton, R32 AP23, Co. Laois, Ireland  
Telephone: +353 57 8684800 or +353 76 1104800  
Lo Call Number: 1890 252 231  
Fax: +353 57 868 4757  
Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)  
Website: <https://www.dataprotection.ie/>

#### **THIRD PARTY SERVICES**

Our websites, domains and apps may contain links to other websites and services, which are managed and controlled by third parties. Please note that this notice does not apply in those cases and we are not responsible for the privacy practices of such third parties.

#### **AMENDING THE NOTICE**

From time to time, we may amend this notice. This might happen, for example, where we make changes to the Services. If we make material changes to the notice, we will take steps to notify you, such as by posting a notice on our website. The notice was last updated at the date indicated further below.

#### **CONTACT US**

If you want to exercise your rights (described above), or if you have any questions about this notice, please contact our Data Protection Lead on the below contact details.

Data Protection Lead: Dylan Condon  
Postal Address: Gortmore, Lombardstown, Mallow, Co. Cork, Ireland  
Telephone: +353 (0) 22 79259  
Email: [data@northcorkelectrical.com](mailto:data@northcorkelectrical.com)

Last updated: 22nd April 2022