



Privacy Notice - Website

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PRIVACY NOTICE - WEBSITE	1
1 WHO WE ARE:	2
2 WHY WE PROCESS YOUR DATA, THE LAWFUL BASIS FOR PROCESSING YOUR DATA AND WHO WE SHARE IT WITH	2
3 TRANSFERS OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA	3
4 INFORMATION RECEIVED FROM THIRD PARTIES AND THE SOURCE OF THAT DATA	3
5 YOUR RIGHTS RELATING TO PERSONAL DATA	3
6 RIGHT TO ERASURE	4
7 REQUIREMENT TO PROCESS PERSONAL DATA	4
8 AUTOMATED DECISION-MAKING AND PROFILING	4
9 APPENDIX 1 – COOKIE POLICY	5



1 Who we are:

We are Focal Fact Limited of Level 1, The Chase, Carmanhall Road, Sandyford, Dublin 18, Ireland. You can contact us at this address by post or by email at info@focalfact.com.

Our data protection representative is Yevgen Shatalov

2 Why we process your data, the lawful basis for processing your data and who we share it with

2.1 For people who view and interact with our website, we process data:

- to respond to your query when sent through our 'contact us' form

The legal basis for this processing is our legitimate interest in the administration and operation of our services as well as our legitimate interest in marketing and promoting our company's services. To opt out of receiving such communications email optout@focalfact.com.

We share this data with our client relationship management system provider. They may only process this data for the purpose of providing us with their services, and no other purpose.

We will retain this data for a period of 1 year after you contact us,

2.2 For our potential clients we process data:

- in order to market the services of our company

The legal basis for this processing is our legitimate interest in the administration and operation of our services as well as our legitimate interest in marketing and promoting our company's services. To opt out of receiving such communications email optout@focalfact.com.

We share this data with our client relationship management system provider. They may only process this data for the purpose of providing us with their services, and no other purpose.

We will retain this data for as long as you consent to us retaining your data.

2.3 For our current & past clients, we process data:

- in order to provide you with our services

The legal basis for the processing of this data is processing necessary for the performance of a contract to which you are a party.

We do not collect special categories of data.

There may also be limited circumstances where our legal basis for processing is your consent (where we have sought it and you have provided it to us), in which case you can withdraw your consent at any time.

We share this data with our ERP system provider. We may also send you emails through our email service provider. They may only process this data for the purpose of providing us with their services, and no other purpose.

We will retain this data for the longer period of

- 2 years from the date you cease to be a client or
- for as long as you consent to us retaining your data.

2.4 For Member applications to become Members on Focal Fact Membership Platform, we process data:

- to enlist new Members



- to ascertain your suitability to become a Member

The legal basis for this processing is processing necessary for the purpose of the legitimate interests of our company in finding new Members.

We share the information you provide in your application with our Internet hosting company were the data is retained. This Internet hosting company is not permitted to use this data other than on our behalf. We may also send you emails about your application through our email service provider.

We will retain this data for the longer period

- of 2 years from the date you sent the application if you do not become a Member or
- 2 years from the date you cease to be a Member.

2.5 For job applicants to the company, we process data:

- to recruit new employees
- to ascertain your suitability for a specific role

The legal basis for this processing is processing necessary for the purpose of the legitimate interests of our company in recruiting new staff.

We share the information you provide in your application with our contracted recruiter in order to make a shortlist of candidates. This recruiter is not permitted to use this data other than on our behalf. We may also send you emails about your application through our email service provider.

We will retain this data for the longer period

- of 2 years from the date you sent the application if not employed or
- 2 years from the date you cease to be employed by us.

3 Transfers of data outside the European Economic Area

We transfer data relating to website visitors, clients, potential clients, job applications and Member applications to Register365.ie located in the *UK. The safeguard we have put in place for this transfer is to enter into European Commission approved processes with the provider, such as EU standard contractual clauses.

We transfer data relating to website visitors, clients, potential clients, job applications and Member applications to Microsoft Dynamics CRM located in the *UK and USA. The safeguard we have put in place for this transfer is to enter into European Commission approved processes with the provider, such as EU standard contractual clauses.

* While the UK remains part of the EU no additional requirements are necessary, however, should the UK leave the EU with not agreement to deal with cross border data the above safe guards will be implemented.

4 Information received from third parties and the source of that data

- Data you make public: We may collect or obtain your Personal Data that you patently choose to make public, including via social media (e.g., we may collect information from your social media or business networking profile(s) such as your name, contact details, work history and qualifications).
- We may collect or obtain your Personal Data from third parties who provide it to us (e.g., credit reference agencies; law enforcement authorities; current employer; previous employers, etc.).

5 Your rights relating to personal data

You have the following rights under the GDPR, in certain circumstances and subject to certain exemptions, in relation to your personal data:

- right to access the data - you have the right to request a copy of the personal data that we hold about you, together with other information about our processing of that personal data.
- right to rectification- you have the right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update the information such that it is complete.



6 Right to erasure

You have the right to request us to delete personal data that we hold about you. This is sometimes referred to as the right to be forgotten.

- right to restriction of processing or to object to processing - you have the right to request that we no longer process your personal data for particular purposes, or to object to our processing of your personal data for particular purposes.
- Right to data portability - you have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, commonly used machine readable format.

In order to exercise any of the rights set out above, please contact us at the contact details at the start of this privacy notice.

If we are processing personal data based on your consent, you may withdraw that consent at any time. This does not affect the lawfulness of processing which took place prior to its withdrawal.

If you are unhappy with how we process personal data, we ask you to contact us so that we can rectify the situation.

You may lodge a complaint with a supervisory authority. The Irish supervisory authority is the Data Protection Commission.

7 Requirement to process personal data

You may browse our website without providing us with any personal data and this will not affect your ability to view our website.

If you do not provide us with your information for the purposes described above, we cannot respond to your queries sent through our contact us form, receive services from us as a client, apply for a position at the company, become a Member on our Membership platform or assess your suitability for a role within our company.

8 Automated decision-making and profiling

We do not use any personal data for the purpose of automated decision-making or profiling.



9 Appendix 1 – Cookie Policy

Like many other websites, this website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your browser information, location, device you are using etc. This helps us to improve our website experience for you and deliver a better more personalised service. It is possible to switch off cookies by setting your browser preferences. By using this site, you are agreeing to the use of cookies as described.

This site uses temporary "session" cookies which enable a visitor's web browser to remember which pages on this website have already been visited. Visitors can use this website with no loss of functionality if cookies are disabled from the web browser. Technical details in connection with visits to this website are logged by us for our statistical purposes. The technical details logged are confined to the following items:

- the IP address of the visitor's web server
- the top-level domain name used (for example .ie, .com, .org, .net)
- the previous website address from which the visitor reached us, including any search terms used
- technical details of web browser, device and operating system used by the website visitor

We will make no attempt to identify individual visitors from the technical details listed above, or to associate the technical details listed above with any individual. It is our policy to never to disclose such technical information in respect of individual website visitors to any third party unless obliged to disclose such information by a rule of law. The technical information will be used only by us and only for statistical and other administrative purposes.