


ID 35 Supplier and Contractor Privacy Notice	ISO 9001:2015, ISO14001:2015, ISO45001:2018	
	Date: 18/05/2018	File: W:\IMS\IMS\Approved Integrated Management System Documents (ID)

At Valcroft Ltd t/a – Mr. Binman we endeavour to ensure that the personal data of all our suppliers and contractors is collected and managed in line with the requirements of the GDPR and that our suppliers and contractors understand how the personal data of their staff and employees is managed.

### **Valcroft Ltd t/a – Mr. Binman Responsibilities**

1. The GDPR Officer at Valcroft Ltd t/a – Mr. Binman is responsible for ensuring that this notice is made available to suppliers and contractors prior to Valcroft Ltd t/a – Mr. Binman collecting and / or processing their personal data.
2. Directors and Managers at Valcroft Ltd t/a – Mr. Binman are responsible for ensuring that all suppliers and contractors are aware of this notice and that the suppliers' and contractors' consent to the processing of their data has been secured and documented.

### **Who are we?**

Valcroft Ltd t/a – Mr. Binman is an Irish owned waste recycling organisation servicing over 34,000 household customers and 3,500 commercial clients in Ireland.

The organisation employs over 130 people in the provision of waste management and recycling solutions to the household consumer and business community.

### **Personal Data**

#### **What is Personal Data?**


Under the EU's General Data Protection Regulation (GDPR) personal data is defined as: "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

#### **What Personal Data does Valcroft Ltd t/a – Mr. Binman hold about me?**

The personal data that we may collect or process about the employees and staff of suppliers and contractors, can include the following:

- information needed for invoice and expenses payment purposes;
- contact and emergency contact details;
- health & safety, accident or incident records
- driver records and photo id
- driver records and photo id
- records relating to the individual's ability to perform the job such as training records
- immigration status and work permit records
- location information eg fleet tracking
- where appropriate, disciplinary and grievance records

Where necessary, we may keep information relating to your health, which could include

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GP reports and notes. This information will be used to comply with our health and safety and occupational health obligations, to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate.

- If we process information needed for compliance with our policy for equal opportunities;

Special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data, criminal history or sexual orientation, we will always obtain your explicit consent to process that data, unless this is not required by law or the information is required to protect your health in an emergency.

If, in the future, we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.

All personal data given to us by you will be treated in accordance with General Data Protection Regulations.

#### **Why does Valcroft Ltd t/a – Mr. Binman need my personal data?**

The information that we hold and process about the employees and staff of our suppliers and contractors will be used for legislative, management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the stages of our engagement with you which include:

- the quotation / pre-contract process;
- whilst you are supplying products and services to us;
- when your contract ends.

#### **Where does Valcroft Ltd t/a – Mr. Binman get my data?**


Much of the information we hold will have been provided by you, the supplier or contractor, other sources of information may include internet searches, or the recording of other publicly available information about you.

#### **Does Valcroft Ltd t/a – Mr. Binman need all this personal data about me?**

We must collect sufficient personal data to allow us to correctly identify an individual. The GDPR prevents us from collecting data which we do not need for legitimate purposes. We aim not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access, disclosure or loss.

Please notify us immediately of any changes in relation to your personal data so that we can ensure the accuracy of the personal data (eg change of address or telephone number)

#### **Lawful Basis for Processing Personal Data**

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The GDPR requires that we have to have a lawful basis for processing all personal data that we hold. We process all supplier and contractor personal data in a manner that complies with the GDPR and in line with reasonable expectations.

Our legal basis for processing for your personal data is that you have explicitly given your consent to us. This consent can be given at the time when you become our Supplier or after having read the company's Privacy Statement provide consent to allow the processing of the personal data you have supplied us.

We may need to process your data to pursue our legitimate business interests, for example to prevent fraud, for administrative purposes or reporting potential crimes.

We may need to use your personal data to enable us to comply with any legal requirements, to pursue the legitimate interests of the Company and to protect our position in the event of legal proceedings and, or insurance claims.

If you do not provide us with your data, we may be prevented, in some circumstances, from complying with our obligations. If that is the case we will tell you about the implications of your decision to withhold consent.

#### **Consent**

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

Consent is required for Valcroft Ltd t/a – Mr. Binman to process personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always request your consent before processing.

Where we are processing data based on your consent, you have the right to withdraw that consent at any time by contacting our GDPR Officer to request our Consent Withdrawal Form.

#### **Who will Valcroft Ltd t/a – Mr. Binman share my personal data with?**


There may be occasions when it is necessary for us to transfer information about you to other group companies for purposes connected with your contract or the management of the company's business.

We may also share your details with third parties in order to fulfil our contractual, legal and regulatory obligations. These third parties may include, but not be limited to, our Accountant, Solicitor and other Business Advisors, Subcontractors, Consultants, software or IT providers, or other Professional Services providers.

All Third Parties engaged by Valcroft Ltd t/a – Mr. Binman are must comply with the General Data Protection Regulations. When they no longer need your data to fulfil this service, the third parties will dispose of your personal data in line with Valcroft Ltd t/a – Mr. Binman's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

Your personal data will not be shared for marketing purposes without your consent.

In limited and necessary circumstances, your information may be transferred outside of the

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EEA or to an international organisation to comply with our legal or contractual requirements. Valcroft Ltd t/a – Mr. Binman has safeguards in place to ensure the security of your data in the event that such a transfer takes place.

**How long will Valcroft Ltd t/a – Mr. Binman keep my personal data?**

Valcroft Ltd t/a – Mr. Binman will only retain personal data for as long as it is needed for the purpose for which it was collected. Once the retention period for a record has passed, that record is deleted from our systems. In some instances, Valcroft Ltd t/a – Mr. Binman is required to retain information in accordance with the law, such as information needed for Revenue and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

**What are my rights in relation to my personal data once I give it to Valcroft Ltd t/a – Mr. Binman?**


At any point whilst we are storing or processing your personal data, you as 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. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.
- 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: in the event that Valcroft Ltd t/a – Mr. Binman refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the complaints section below.

All requests will also be forwarded to any third party who is in the processing or storage of your personal data.

**How can I find out the personal data Valcroft Ltd t/a – Mr. Binman holds about me?**

Valcroft Ltd t/a – Mr. Binman at your request, can confirm what information we hold about you and how it is processed. If Valcroft Ltd t/a – Mr. Binman does hold personal data about you, you can request the following information:

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- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Valcroft Ltd t/a – Mr. Binman or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

### **What forms of ID will I need to provide in order to prove that I am the data subject?**

Valcroft Ltd t/a – Mr. Binman accepts the following forms of ID when information on your personal data is requested:

Passport, Driving licence, Birth certificate, Utility bill (not older than 3 months), Current vehicle registration document, Bank statement (not older than 3 months), Rent book (not older than 3 months), Revenue / Social Welfare documentation (not older than 3 months).

### **How do I make a complaint?**

If you wish to make a complaint about how your personal data is being processed by Valcroft Ltd t/a – Mr. Binman, by third parties engaged by Valcroft Ltd t/a – Mr. Binman, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Valcroft Ltd t/a – Mr. Binman's GDPR Officer.


### ***Valcroft Ltd t/a – Mr. Binman GDPR Officer***

If you have any queries or concerns about your personal data, our GDPR Officer can be contacted in the following ways:

#### **By Letter**

GDPR Officer

Valcroft Ltd t/a – Mr. Binman

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Floor 2, Ashbourne Hall, Ashbourne Business Park, Dock Road, Limerick

**By Telephone**

1890 92 92 40

**By Email**

gdpr@mrbinman.com

***Supervisory Authority***

Data Protection Commissioner of Ireland  
Office of the Data Protection Commissioner.  
Canal House,  
Station Road,  
Portarlinton,  
Co. Laois,  
R32 AP2  
Ireland.

Telephone +353 761 104 800 or LoCall 1890 25 22 31

Email [info@dataprotection.ie](mailto:info@dataprotection.ie)