

Privacy Notice

WHO ARE WE?

We are Michael Casey, Michael Kinsella, Peter Sullivan, David Guinan, and Caroline McGrath trading as ("BCA"). We operate at Clonminch Hi Technology Park, Tullamore, Co. Offaly and at 12 Merrion Square, Dublin 2.

We are an accountancy and business advisory firm.

This notice sets out the basis on which any personal data we collect from you, or from others, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Acts 1988 to 2018 and the General Data Protection Regulation (the **GDPR**) (together the **Acts**):

- The data controller is BCA as an employer, as a service provider, and where dealing with suppliers.
- The data processor is BCA when it processes pay roll on behalf of its clients and provides clients with back office support.

Our data protection contact is Michael Casey and he may be contacted at privacy@bca.ie

WHAT PERSONAL INFORMATION DO WE COLLECT FROM YOU?

You may give us personal data or **special category** sensitive data by:

- Engaging the services of BCA. Services Users supply us with information which may include the following: Your full name; your address; your various email addresses; your various phone numbers including mobile phone number; financial information about you, including your bank account details, credit card details, debit card details or other payment details, details of contracts you have entered with third parties for us to provide services to you, details of your driving licence, details of your passport; AML data; PPS number; occupation; utility bills; P60s; Bank Statements and all other Data which you ask us to process on your behalf, or which is necessary for us to process in order for us to fulfil our role as providing a service to you.
- Corresponding with us by phone, e-mail or otherwise. We ask you to disclose only as much information as is necessary to provide you with services or to submit a question/suggestion/comment in relation to our website or our services.
- Filling in forms on www.bca.ie (our website) such as the contact us form.

- Applying to work with us. The type of information you may provide in your CV, a cover letter, your name, address, e-mail address and phone number. CVs should include information relevant to your employment history and education (degrees obtained, places worked, positions held, relevant awards, and so forth). We ask that you do not disclose sensitive personal information (e.g. gender, height, weight, medical information, religion, philosophical or political beliefs, financial data, photographs, pre-employment medical details) in your application.
- Using our facilities. CCTVs are used on our premises to monitor health and safety standards and for security.
- Medical and Health data where we provide you with Pension and Life services.
- Data provided when BCA conduct audits.

WHAT INFORMATION ABOUT YOU DO WE OBTAIN FROM OTHERS?

When you use our services, we may obtain the following categories of personal data from others: to include Revenue, your authorised Representatives, Pension and Life Insurance Providers.

WHY DO WE COLLECT THIS INFORMATION?

We collect the information in order to provide you with our services, to market our services, to communicate with you, to improve our website and to recruit staff.

We will use this information:

Clients:

- To set you up as a Client on our systems;
- To provide you with our services.

Candidates:

- To create a candidate profile for you if you are a prospective employee or volunteer;
- To process employment applications, including by assessing qualifications, verifying information, conducting reference or other employment-related checks, and notifying you of future opportunities that might be of interest to you.

Website users:

- To administer and improve our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- As part of our efforts to keep our website safe and secure;

- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- To make suggestions and recommendations to you and other users of our website about services that may interest you or them.

The legal bases for the processing of your personal data are:

- Processing necessary for the performance of a contract which you have entered into with us or to take steps at your request prior to entering into a contract;
- That you have provided consent for the processing for one of more specified purposes such as marketing for example when you fill out consent to receiving marketing material;
- Processing necessary for compliance with a legal obligation to which we are subject;
- Processing necessary for the purposes of the legitimate interest which we pursue in providing you with quotes and proposals about our services prior to contract where such interests are not overridden by your interests or fundamental rights or freedoms which require the protection of your information.

The legal bases for the processing of your special category data or sensitive data (for example medical data) are:

- That you have explicit provided consent;
- Processing necessary for compliance with a legal obligation to which we are subject.

WHO DO WE SHARE THIS INFORMATION WITH?

We may share your personal data with our selected business associates, government bodies, suppliers and contractors to provide you with our services. For example, these partners may include our web hosting provider and our IT service providers.

In addition, we may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- If we or substantially all of our assets are acquired by a third party, in which case information held by us about our customers will be one of the transferred assets;
- If we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect our rights, property, or safety, our customers,

or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
We attach at Schedule 1 a list of all entities with whom your personal data is shared.

HOW LONG DO WE KEEP HOLD OF YOUR INFORMATION?

The time periods for which we retain your information depends on the type of information and the purposes for which we use it. We will keep your information for no longer than is required or permitted. We keep your Data for as long as is necessary for the performance of the contract between you and us and to comply with our legal obligations. If you no longer want us to use your Data to provide this service to you, you can request that we erase your Data and close your account with us. Please note that if you request the erasure of your Data:

- We may retain some of your Data as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety
- We may retain and use your Data to the extent necessary to comply with our legal obligations. For example, we may keep some of your information for tax, legal reporting and auditing obligations.
- Because we maintain our records to protect from accidental or malicious loss and destruction, residual copies of your Data may not be removed from our backup systems for a limited period of time.

DO WE TRANSFER YOUR INFORMATION OUTSIDE THE EUROPEAN UNION OR EUROPEAN ECONOMIC AREA?

Transfer of your Data outside the European Union

We may transfer the Data we collect about you to countries outside the EU. Where there is no adequate decision by the European Commission in respect of any such country that means that that country is deemed not to provide an adequate level of protection for your data. However, to ensure your Data does receive an adequate level of protection we will in such circumstances put in place appropriate measures such as the use of model contractual clauses as approved by the European Commission to ensure that your personal data is treated by those third parties in ways that are consistent with respect to EU and Irish Laws on Data Protection

WHAT ARE YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA?

You have the following rights:

- The right to access the personal data we hold about you.
- The right to require us to rectify any inaccurate personal data about you without undue delay.

- The right to have us erase any personal data we hold about you in circumstances such as where it is no longer necessary for us to hold the personal data or, in some circumstances, if you have withdrawn your consent to the processing.
- The right to object to us processing personal data about you such as processing for profiling or direct marketing.
- The right to ask us to provide your personal data to you in a portable format or, where technically feasible, for us to port that personal data to another provider provided it does not result in a disclosure of personal data relating to other people.
- The right to request a restriction of the processing of your personal data.

Where our processing of your personal data is based on your consent to that processing, you have the right to withdraw that consent at any time but any processing that we have carried out before you withdrew your consent remains lawful.

You may exercise any of the above rights by contacting Michael Casey at privacy@bca.ie. You may lodge a complaint with your local supervisory authority with respect to our processing of your personal data. The local Supervisory Authority in Ireland is the Data Protection Commission. The website is www.dataprotection.ie.

WHAT WILL HAPPEN IF WE CHANGE OUR PRIVACY NOTICE?

This notice may change from time to time, and any changes will be posted on our website and will be effective when posted. Please review this notice each time you use our website or our services. This notice was last updated on 17 August 2018.

HOW CAN YOU CONTACT US?

Our Data Protection Contact Michael Casey can be contacted by e mail at privacy@bca.ie

By phone: +353 (0)57 93 66700

Address: Clonminch Hi Technology Park, Tullamore Co Offaly

Or by email: privacy@bca.ie

Schedule 1

List of Third Parties with Whom We Share your data

Name of Party	Description of service provided/reason for sharing
Relate	CRM software and company secretarial services
Sage	Payroll services
Micropay	Payroll services
Revenue Commissioners	Legal obligation to disclose certain information
Crowley McCarthy	Payroll services
Midland Micro Systems	IT Services
SQL	Database
Blueprint	SQL (structured query language) database used for company secretarial.
Aviva	Pension provider
All Star Shred	Shredding company
OMC Security	Fob and door locks
Aviva Friends First Independent Trustee Company Standard Life Davy Newcourt	Life and Pension Provider Life and Pension Provider Life and Pension Provider Insurance Life and Pension Provider Life and Pension Provider Life and Pension Provider