

Privacy Notice (Terms of Engagement)

1. Who we are:

We are Italicatessen Limited of Block F, Newtown Business and Enterprise Park, Newtownmountkennedy, Co. Wicklow. You can contact us at this address by post or by email at info@italicatessen.ie

Our data protection representative is **Eve Kelly, Human Resources Manager** and her email is eve@italicatessen.ie

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

A. For our clients, we process data:

- in order to provide you with our services
- managing and administering you or your organisation's business relationship with Italicatessen Limited, including processing payments, accounting, auditing, billing and collection and support services
- to inform you of any promotions or special offers

We retain the following information:

- **Parent Company Name**
- **Business Address**
- **Type of Business (retail, food service etc)**
- **Email Addresses: Accounts email (for the purposes of providing invoices, statements, POD's and queries around payment), Business email (for the purposes of sending a monthly newsletter and special offers)**
- **VAT Registration Number (to validate VAT compliance)**
- **Company registration number (to show the legitimacy of the Business)**
- **Landline business phone number (For accounts/queries)**
- **Mobile phone numbers for employees who may receive deliveries (with their express permission)**
- **Director's Name & home address**
- **Two trade referees: Name, address, telephone number.**

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

Where we process special categories of data relating to you, e.g. health data that we may process in connection with a legal claim where we are acting on your behalf, our legal basis for processing will be that the processing is necessary for the establishment, exercise or defence of legal claims.

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 practice management 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 legally required period of time. For further information regarding relevant retention periods, customers should refer to our data retention policy which is available on our website www.italicatessen.ie

- B. For our potential, current and past clients, we process data:
- in order to market the services of our Company
 - to provide you with updates and newsletters to which you have subscribed
 - to answer any queries, you may have in relation to the Company
 - in provide information to new customers via our website

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 firm's services. We always include an unsubscribe button in our communications, so you can opt out of receiving such communications at any time.

We share information such as your name and email address with our newsletter services provider who sends out our newsletters. This provider is not permitted to use this data other than on our behalf.

We will retain this data for legally required period of data.

3. Information received from third parties and the source of that data

We may obtain personal data relating to you where that information is publicly available and/or it was provided to us by another person on your behalf.

4. Transfers of data outside the European Economic Area

In certain circumstances, we may transfer your personal data outside the European Economic Area ("EEA"). We will only transfer your data where the EU Commission has decided that the third country in question ensures an adequate level of protection in line with EU data protection standards, or where there are appropriate safeguards in place to protect your personal data.

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.
- **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 Office of the Data Protection Commission.

6. Requirement to process personal data

If you do not provide us with your information for the purposes described above, we cannot provide you with our services, or send you our newsletter.

7. Automated decision-making and profiling

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