

# **Data Privacy Notice – 10th February 2019**

**This is your guide to how personal data is managed by Jimmy Walsh Propellers and Marine Engineering Ltd. Please read it carefully.**

Data privacy is taken very seriously at Jimmy Walsh Propellers and Marine Engineering Limited. It is important that you know exactly what we do with the personal information you and others provide to us, why we gather it and what it means to you. This document outlines our approach to Data Privacy to fulfil our obligations under the General Data Protection Regulation (2018). We also welcome it as an opportunity to reassure you of the importance we place on keeping your personal data secure, and of the strict guidelines we apply to its use. We want you to be clear on:

1. Who we are
2. The information we collect about you
3. When and how we collect information about you
4. How we use your information\*
5. Who we share your information with
6. How long we hold your information
7. Implications of not providing information
8. The legal basis for using your information
9. Processing your information outside the EEA
10. How to exercise your information rights (including the right to object)?
11. How to contact us and/or our Data Protection Officer
12. Changes to this notice

Jimmy Walsh Propellers and Marine Engineering Limited complies with the requirements of the General Data Protection Regulation 2018 and the Irish Data Protection Act 2018. The data which you provide to us will be held on a computer database and paper files for the purpose of arranging transactions on your behalf. The data will be processed only in ways compatible with the purposes for which it was given and as within this Privacy Notice.

Please contact us at [info@onestoppropshop.ie](mailto:info@onestoppropshop.ie) if you have any concerns about your personal data. You have the right at any time to request a copy of any ‘personal data’ (within the meaning of the GDPR) that our office holds about you and to have any inaccuracies in that information corrected.

## **1. Who we are**

Throughout this document, “we”, “us”, “our” and “ours” refers to Jimmy Walsh Propellers and Marine Engineering Limited.

## **2. The information we collect about you**

There are a number of reasons for gathering information about you. For instance, we need to know how to get in touch with you, so we can offer you products and services and give you the best possible customer experience. The information we collect falls into various categories.

- **Identity & contact information**

Name, contact details email address, work and personal phone numbers.

### **Information which you have consented to us using**

- Your agreement to allow us contact you through certain channels to offer you relevant products and services.

We collect information about your internet activity using technology known as cookies, which can often be controlled through internet browsers. For detailed information on the cookies we use and the purposes for which we use them, see our Cookie Policy, which is available on our website.

CCTV images at our offices (but only for security reasons and to help prevent crime).

## **3. When and how we collect information about you**

Jimmy Walsh Propellers and Marine Engineering Limited will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation. We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary.

As you use our services, apply for products, make enquiries and engage with us, information is gathered about you and from sources where you have chosen to make your information publicly available, such as social media sites.

#### **When we collect information about you:**

- When you ask us to provide you with certain products and services. For example, stern-gear or drive train products may require us to collect relevant information from you.
- When you use our website and online services provided by us and visit our offices.
- When you or others give us information verbally or in writing. This information may be on application forms, in records of your transactions with us or if you make a complaint.
- When you use our products or services, including making transactions on how much the payments are for and when the payments are made.
- From information publicly available about you – for example in trade directories, online forums, websites, Facebook, Twitter, YouTube or other social media. When you make information about yourself publicly available on your social media accounts or where you choose to make information available to us through your social media account, and where it is appropriate for us to use it, this information can help enable us to do things like:
  1. improve our service (for example, identifying common service issues),
  2. personalise your online experience with us
  3. contact you through the social media services, and
  4. enable you to share your experience and content via social media services.
- From your online activities with third parties where you have given us your consent (for example, by consenting to our use of certain cookies or other location tracking technologies).

## **4. How we use your information**

Whether we're using it to confirm your identity, to help in the processing of an application for a product or service or to improve your experiences with us, your information is always handled with care and the principles outlined in this Data Privacy Notice are always applied. We use your information:

- To provide our products and services to you, and to fulfil our contract with you**

To provide our products and services to you and perform our contract with you, we use your information to:

- Manage and administer products and services that we or our partners may provide you with.
- Contact you by post, phone, text message, email, social media, fax, or other means, but not in a way contrary to your instructions to us or contrary to law.
- Monitor and record our conversations when we speak on the telephone (for example, to check your instructions to us, to analyse, to assess and improve customer service and for training and quality purposes). o Recover debts you may owe us.
- Manage and respond to a complaint or appeal.

- To manage our business for our legitimate interests**

To manage our business, we may use your information to:

- Provide service information, to improve our service quality and for training purposes
- We may gather information about your interactions with us.

- To run our business on a day to day basis including to:**

- Carry out strategic planning and workload management.
- Protect our business, reputation, resources and equipment, manage network and information security (for example, developing, testing and auditing our websites and other systems, dealing with accidental events or unlawful or malicious actions that compromise the availability, authenticity, integrity and confidentiality of stored or transmitted personal data, and the security of the related services) and prevent and detect fraud, dishonesty and other crimes (for example, to prevent someone trying to steal your identity), including using CCTV at our premises.
- Manage and administer Jimmy Walsh Propellers and Marine Engineering Limited legal and compliance affairs, including compliance with regulatory guidance and voluntary codes of practice to which we have committed.

- To buy and/or sell assets of Jimmy Walsh Propellers and Marine Engineering Limited:**

- Members of Jimmy Walsh Propellers and Marine Engineering Limited may in the future wish to sell, transfer or merge part or all of its business or assets or to buy a new business or the assets of another business or enter into a merger with another business. If so, we may disclose your personal information under strict duties of confidentiality to a potential buyer, transferee, merger partner or seller and their advisers, so long as they agree to keep it confidential and to use it only to consider the possible transaction. If the transaction goes ahead, the buyers, transferee or merger partner may use or disclose your personal information in the same way as set out in this Data Privacy Notice.

- **To comply with our legal and regulatory obligations**
  - We need to use your information to comply with legal and regulatory obligations including:  
Complying with your information rights.
  - Providing you with statutory and regulatory information and statements.
  - Preparing returns to regulators and relevant authorities including preparing income tax, capital gains tax, capital acquisition tax and other revenue returns.
  - Reporting to and, where relevant, conducting searches on other industry registers.
  - Complying with court orders arising in civil or criminal proceedings.

- **Where you have given us permission (which you may withdraw at any time)**

Where you have given us permission (which you can withdraw at any time) we may:

- Send electronic messages to you about product and service offers from Jimmy Walsh Propellers and Marine Engineering Limited.
- Share your data with third parties so that they may send you electronic messaging about their products and offers.
- Use cookies in accordance with our Cookie Policy.
- Use special categories of data, or sensitive data.
- Use information you have made public and combine with this with the activities outlined above. When we ask for your consent, we will provide you with more information on how we will use your data in reliance on that consent, including in relation to third parties we would like your consent to share your data with.

## **5. Who we share your information with**

We only share your information with a select number of individuals and companies, and only as necessary. Sharing can occur in the following circumstances and/or with the following persons:

- Your authorised representatives:
- Third parties we need to share your information with in order to facilitate payments you have requested (for example, SWIFT, credit card issuers and merchant banks) and those you ask us to share your information with.
- Companies that provide support services for the purposes of protecting our legitimate interests.

Your personal information remains protected when our service providers use it. We only permit service providers to use your information in accordance with our instructions, and we ensure that they have appropriate measures in place to protect your information.

- Statutory and regulatory bodies (including central and local government) and law enforcement authorities.

These include the courts and those appointed by the courts, government departments, statutory and regulatory bodies in all jurisdictions where Cavanagh Hooper Dolan Insurances Limited operates including: the Central Bank of Ireland, the Data Protection Commission, the Financial Services and Pensions Ombudsman, An Garda Síochána/police authorities/enforcement agencies, Revenue Commissioners, Criminal Assets Bureau, US, EU and other designated authorities in connection with combating financial and other serious crime, NAMA and its agents or other parties designated by or agreed with NAMA or

designated under the relevant legislation, police forces and security organisations, ombudsmen and regulatory authorities, as well as fraud prevention agencies.

- Third parties in connection with a sale or purchase of assets by a member of Jimmy Walsh Propellers and Marine Engineering Limited

## **6. How long we hold your information**

The length of time we hold your data depends on a number of factors, such as regulatory rules and the type of product we have provided to you. Those factors include:

- The type of data we hold about you.
- As a general rule, we keep your information for a specified period after the date on which a transaction has completed or you cease to be a customer. In most cases this period is six (6) years.

## **7. Implications of not providing information**

Sharing information with us is in both your interest and ours.

- We need your information in order to:

Provide our products and services to you and fulfil our contract with you.

Manage our business for our legitimate interests.

Comply with our legal obligations.

Of course, you can choose not to share information, but doing so may limit the services we are able to provide to you.

We may not be able to provide you with certain products and services that you request.

When we request information, we will tell you if providing it is a contractual requirement or not, and whether or not we need it to comply with our legal obligations.

## **8. The legal basis for using your information**

We will use your data and share that data where:

- Its use is necessary in relation to a service or because you have asked for something to be done so you can enter into a contract with us.
- Its use is in accordance with our legitimate interests outlined in this notice.
- Its use is necessary because of a legal obligation that applies to us (except an obligation imposed by a contract).
- You have consented or explicitly consented to the using of your data (including special categories of data) in a specific way.
- Its use is necessary to protect your “vital interests”.

In exceptional circumstances we may use and/or disclose information (including special categories of data) we hold about you to identify, locate or protect you, for example, if it comes to our attention that you are in imminent physical danger and this information is requested by An Garda Síochána or your relative.

- Where you have made clearly sensitive categories of data about yourself public.
- Where the processing of special categories of data is necessary for the establishment, exercise or defence of legal claims.

## **9. Processing your information outside the EEA**

Your information is stored on secure systems within Jimmy Walsh Propellers and Marine Engineering Limited premises and with providers of secure information storage. We may transfer or allow the transfer of information about you to organisations outside the European Economic Area (EEA), but only if they agree to act solely on our instructions and protect your information to the same standard that applies in the EEA.

- Using companies to process your information outside the EEA.
  - Adherence to the EU/US Privacy Shield. You can find more information on the EU/US Privacy Shield at [www.privacyshield.gov](http://www.privacyshield.gov) including a list of all organisations that have signed up to the EU/US Privacy Shield framework. Please contact us for further details on any transfers of personal information by Jimmy Walsh Propellers and Marine Engineering Limited to entities in the US.

## **10. How to exercise your information rights (including the right to object)**

Providing and holding personal information comes with significant rights on your part and significant obligations on ours. You have several rights in relation to how we use your information. If you make your request electronically, we will, where possible, provide the relevant information electronically unless you ask us otherwise: You have the right to:

- 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.
- 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.
- Withdraw consent at any time, where any processing is based on consent – if you withdraw your consent, it will not affect the lawfulness of processing based on your consent before its withdrawal.

We are obliged to respond without undue delay. In most instances, we will respond within one calendar month. If we are unable to deal with your request fully within a calendar month (due to the complexity or number of requests), we may extend this period by a further two calendar months. Should this be necessary, we will explain the reasons why. If you make your request electronically, we will, where possible, provide the relevant information electronically unless you ask us otherwise.

You have the right to complain to the Data Protection Commission. You can contact the Office of the Data Protection Commissioner at:

**Web: [www.dataprotection.ie/docs/Contact-us/b/11.html](http://www.dataprotection.ie/docs/Contact-us/b/11.html)**

**Telephone: +353 (0)761 104 800 or Lo Call Number 1890 252 231**

**Fax: +353 57 868 4757**

**E-mail: [info@dataprotection.ie](mailto:info@dataprotection.ie)**

**Postal Address: Data Protection Commission, Canal House, Station Road,  
Portarlington, R32 AP23, Co. Laois.**

## **11. How to contact us and/or our Data Protection Officer**

If you have any questions about how your personal data is gathered, stored, shared or used, or if you wish to exercise any of your data rights, please contact our Data Protection Officer at Telephone: +353 863702499, E-mail: [info@onestoppropshop.ie](mailto:info@onestoppropshop.ie) Postal Address: Propeller Shop, Ballygillane Little, Rosslare Harbour, Co. Wexford, Ireland. Y35HK49.

## **12. Changes to this notice**

We will update this Data Privacy Notice from time to time. When such a change is made, we will post a revised version online. Changes will be effective from the point at which they are posted. It is your responsibility to review this privacy policy periodically so you're aware of any changes. By using our services, you agree to this privacy policy.