

# KEYSTONE PRIVACY NOTICE

*This document refers to personal data, this is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.*

*General Data Protection Regulations (GDPR) seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain such as Companies House data.*

*Keystone uses the information collected from you to make telephone contact or to email you in connection with our business. In you making initial contact you consent to Keystone maintaining a marketing dialogue with you until you optout (which you can do at any stage).*

*Some personal data may be collected about you from the forms and any surveys you may complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to personally-identifying information like Internet Protocol (IP) addresses. Keystone may from time to time use such information to identify its visitors. Keystone may also collect statistics about the behaviour of visitors to its website.*

*Our website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. We use cookies to help identify and track visitors and your website access preferences. Visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using the Keystone website.*

*As part of our terms of business, Keystone will collect, process, secure and use personal data to provide quality service for customer and business needs. Any information Keystone holds about you and your business encompasses all the details we hold about you and any sales transactions including any third-party information we have obtain about you from public sources and our own suppliers.*

*We are committed to being transparent about how we collect and use the data and meeting our data protection obligations. Keystone will only collect the information needed so that it can provide you with our services, we will never sell or broker your data.*

*The address and contact details of the data controller (Keystone) are set out at the end of this privacy notice.*

## **What information do we collect?**

Keystone collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- information requirements for payments, including bank details;
- information about medical conditions;
- information regarding any disclosed convictions;
- previous claims history;
- information about previous judgements including bankruptcy

Other information held includes correspondence with or about you, for example letters or emails to you.

Data will be stored in a range of different places, including manual files and on our Relay Applied Systems Software.

## **Why does Keystone process personal data?**

### **Legal basis for processing any personal data**

To meet Keystones contractual obligations to customers and suppliers and to also respond to marketing and product enquiries.

Legitimate interests pursued by Keystone and/or its clients

To promote the products and marketing services offered by Keystone.

### **Consent**

Through agreeing to this privacy notice you are consenting to Keystone processing your personal data for the purposes outlined. You can withdraw consent at any time.

Keystone needs to keep and process information about you for normal business purposes. The information we hold and process will be used for lawful and legitimate business purposes only. We will keep and use it to enable us to provide a service to you and manage our relationship with you effectively, lawfully and appropriately. This includes using information to enable us to comply with the service contract, to comply with any legal requirements, pursue the legitimate interests of the Company and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

Much of the information we hold will have been provided by you, but some may come from other internal and/or external sources.

Where necessary, we may keep information relating to your health and criminal convictions. This information will be used to comply with our legal and compliance obligations - we will also need this data to administer and manage our service to you.

Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

In keeping with Keystone's data security policies, we may monitor and record telephone conversations. We may also keep computer records by way of the Relay system and Relay iCloud system.

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.

## **Who has access to your data?**

Your information may be shared internally for legitimate business purposes only. This includes all employees of Keystone involved in the provision of a service to you, managers in the business area and IT staff if access to the data is necessary for the performance of their roles.

We will only disclose information about you to third parties, by consent, if we are legally obliged to do so or where we need to comply with our contractual duties to you, for instance we will need to pass on certain information to our list of approved insurance providers.

Keystone may on occasions pass your Personal Information to third parties exclusively to process work on its behalf. Keystone requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR. Keystone do not broker or pass on information gained from your engagement with the agency without your consent. However, Keystone may disclose your Personal Information to meet legal obligations, regulations or valid governmental request. The agency may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of Keystone, its clients and/or the wider community.

## **How does Keystone protect your data?**

We take the security of your data seriously. We have technical measures and internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

## **For how long does Keystone keep data?**

### **Retention policy**

Keystone will process personal data during the duration of any contract and will continue to store only the personal data needed on a manual file, on the Relay Applied Systems Software application and, on the Relay iCloud system. Your data will be held for a period of 7 years. This is to allow us to meet our legal obligations.

### **Data storage**

Data is held on-site in Ireland using the Relay Applied Systems Software. Data is backed-up to the Relay iCloud servers based in Ireland. Keystone does not store personal data outside the EEA.

## **Your Rights**

As an Data Subject you have a number of rights. You can:

- access and obtain a copy of your data on request;
- request that Keystone changes incorrect or incomplete data;
- request that Keystone deletes or stops processing your data;
- object to the processing of your data where Keystone is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact **info@keystone.ie**

If you believe that the organisation has not complied with your data protection rights, you can complain to the Data Protection Commissioner (dataprotection.ie).

### **Address and contact details of the data controller (Keystone)**

Keystone House

Newry Road

Lisdoon

Dundalk

Co. Louth

Ireland

Telephone – 1890 987 600