

Data Protection Notice

The General Data Protection Regulation (GDPR) is a new EU law that comes into effect across all EU Member States, including Ireland, on 25th May, 2018. The GDPR reforms EU rules on data protection. The GDPR protects the privacy rights of individuals and places further requirements on organisations to safeguard individuals' personal data that they collect use and store.

Dawn Meats (hereafter called 'The Company') has created this Data Protection Notice as the controller of employees' personal data to demonstrate our firm commitment to privacy and to inform employees about the information we collect and process in connection with your employment. If you have any queries about this notice please contact our Data Protection Project Manager at gdpr@dawnmeats.com.

This notice sets out an explanation of what information about you we process, why we process your information, with whom your information is shared and a description of your rights with respect to your information.

Principles of Data Protection under GDPR

The principles of data protection are that data should be:

- Processed fairly, lawfully and transparently,
- Used only in ways which are compatible for the purpose for which it is given,
- Accurate and up to date,
- Adequate, relevant and limited to what is necessary for the purpose for which it is given,
- Only kept for specified, explicit and legitimate purposes(s),
- Retained for no longer than necessary,
- Kept safely and securely.

Personal Data

Personal data is any information related to an identified or identifiable living individual (referred to as a 'data subject'). For the company this means any information relating to its employees. The definition not only includes names, addresses and other factors specific to the identity of an employee but also online identifiers such as an IP address and location data. Data that identifies employees are examples of personal data.

All personal information which the Company holds about you is protected by data protection laws. The Company take its responsibilities under these laws seriously and holds some or all of the following personal data about you - name, address, date of birth, personal email address, personal phone number, marital status, next of kin, educational or previous employment background, history and details of current position, CVs, applications and interview records, references, performance ratings or reviews, bank details, medical records, PPS number, work permit, criminal history, salary, bonuses, records of internet or email usage, CCTV images, records of disciplinary investigations/meeting or grievances, pension and other insurance documentation, payroll details and other related data.

Special Category (Sensitive) Personal Data

'Special categories of personal data' are specific categories of personal data related to a person's profile: race or ethnicity; political, religious or philosophical beliefs; sexual life or sexual orientation; health; genetic or biometric data or trade union membership. There are additional requirements for the protection of sensitive personal data by organisations.

At Dawn Meats the special categories of personal data we process are your image and your health information. We will process your trade union membership where you request us to do so, but you can ask for us to cease such processing at any stage. We do not specifically request information on religious belief or ethnicity but based on you providing information such as dietary requirements it may on occasion result in processing such information.

Data Processing

Processing of personal data can cover many different uses of that personal data (in either electronic or a physical format), including collecting, recording, storing, adapting, using, disclosing and deleting data. The GDPR covers personal data held either electronically or physically – this includes, for example, physical files, emails, images or recordings of individuals.

Lawful Basis for Processing

As your employer we need to keep and process certain information, as listed above, about you for normal employment and Human Resources management purposes, as part of our contract with you, to comply with our legal obligations, to protect the vital interest of the data subject and to protect our legitimate business interests. We collect and process information from you during the recruitment process, during our employment relationship and following the termination of our employment relationship.

Personal data is normally obtained directly from you. In certain circumstances it will, however, be necessary to obtain data from internal third parties, for example your line manager, or from external third parties, for example, references from previous employers, the Revenue Commissioners etc. We may also obtain information from publicly available sources such as social media.

Processing

The information we hold and process will be used for management and administrative purposes. We keep it and use it to enable us to run our business, manage our employment relationship with you effectively, lawfully and appropriately and protect employees' rights and interests. This includes using your information to enable us to manage the employment contract, comply with legal obligations, pursue our legitimate interests and protect our legal position in the event of legal proceedings against the Company.

For these purposes, it may from time to time be necessary to disclose your personal information to third parties where we are legally obliged to do so or where our employment contract requires or permits us to do so, for example we pass on certain information to pension brokers/trustees, or insurers, auditors/ethical auditors, Revenue Commissioners, Workplace Relations Commission, the Department of Social Protection and medical practitioners. It may also be necessary to disclose information to comply with any legal or regulatory obligations. The Company takes all reasonable steps as required by law to ensure the safety, privacy and integrity of your personal information.

The Company may transfer your personal data to other group companies within the EEA for purposes connected with your employment or the management of the company's business.

The Company may need to share personal data including sensitive personal data with other related entities which are based abroad. This may involve a transfer of data, including your personal sensitive data to a country which may not have the same data protection laws as Ireland.

Retention of Personal Data

Any personal data processed about you is retained only for as long as it is required or in line with relevant statutory retention periods or other regulatory requirements which may impact retention periods. The Company has implemented appropriate measures to ensure your personal information is securely destroyed in a timely and consistent manner when no longer required.

What happens if you do not provide us with your information?

In some cases, you may decline to provide us with your personal data. However, if we require relevant information to effectively and properly manage our employment relationship, we may not be able to continue our employment relationship with you if you decline to provide us with that personal data.

Profiling or Automated Decision Making

You will not be subject to automated decision making or profiling.

Your Rights Under Data Protection Law

You have the following rights under Data Protection law, although your ability to exercise these rights may be subject to certain conditions:

- the right to receive a copy of and/or access the personal data that we hold about you, together with other information about our processing of that personal data,
- 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,
- the right, in certain circumstances, to request that we erase your personal data,
- the right, in certain circumstances, to request that we no longer process your personal data for particular purposes, or object to our use of your personal data or the way in which we process it,
- the right, in certain circumstances, to transfer your personal data to another organisation,
- the right to object to automated decision making and/or profiling; and
- the right to complain to the Data Protection Commissioner.

Further Information

This Data Protection notice is non-contractual.

If you have any queries regarding this Data Protection Notice or if you have any concerns as to how your data is processed please contact the Data Protection Manager at gdpr@dawnmeats.com or your site Human Resources Department.

Review

This Data Protection notice will be reviewed from time to time to take into account changes in the law and the experience of the notice in practice. The first review of the notice will take place after two years of operation.

I acknowledge receipt of and confirm that I have read and understood this Data Protection Notice.

Employee Name (Print): _____

Employee Signature: _____

Date: _____

Revision History

Version Number	Reason for Change	Effective Date	Department
1	Initial Release	25.05.2018	HR Department