

**LIMERICK COMPUTERS**

# Data Privacy Notice

How we protect and manage your personal data

## **DATA PRIVACY MATTERS**

This is your guide to how personal data is stored and managed by **Electronic Industrial Supports Ltd. (Limerick Computers, Limerick Data Recovery)**. Please read it carefully.

Data privacy is taken very seriously at **Electronic Industrial Supports Ltd.** 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. **How we use automated processing or “analytics”**
6. **Who we share your information with**
7. **How long we hold your information**
8. **Implications of not providing information**
9. **The legal basis for using your information**
10. **Processing your information outside the EEA**
11. **How to exercise your information rights (including the right to object)**
12. **How to contact us and/or our Data Protection Officer**
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## 1. Who we are

Throughout this document, “we”, “us”, “our” and “ours” refer to **Electronic Industrial Supports Ltd., Limerick Computers and Limerick Data Recovery.**

**“Electronic Industrial Supports Ltd.”** means:

- ✓ The company incorporated in Ireland with Limited Liability 18th of December 1990.
- ✓ Registered Address: Foxhill House, Old Dublin Road, Groody Hill, Limerick.
- ✓ Registered Number: 182550.

**“Limerick Computers”** means:

- ✓ Business name registered by **Electronic Industrial Supports Ltd.** 13th of July 1996.
- ✓ Registered Address: Foxhill House, Old Dublin Road, Groody Hill, Limerick.
- ✓ Registered Number: 307047.

**“Limerick Data Recovery”** means:

- ✓ Business name registered by **Electronic Industrial Supports Ltd.** 03th of February 2017.
- ✓ Registered Address: Foxhill House, Old Dublin Road, Groody Hill, Limerick.
- ✓ Registered Number: 589663.

## 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 and we need to be certain of your identity, so we can offer you our services and products and give you the best possible customer experience. The information we collect falls into various categories.

✓ **Identity & contact information.**

Name, email addresses, work and personal phone numbers.

✓ **Financial details/circumstances.**

Bank account details, credit/debit card details, personal guarantees provided, your employment status and employment details of your partner.

✓ **Information you provide us about others or others provide us about you.**

If you give us information about someone else (for example, information about a spouse or a friend provided during the laptop repair service request), or someone gives us information about you, we may add it to any personal information we already hold and we will use it in the ways described in this Data Privacy Notice.

Before you disclose information to us about another person, you should be sure that you have their agreement to do so. You should also show them this Data Privacy Notice. You need to ensure they confirm that they know you are sharing their personal information with us for the purposes described in this Data Privacy Notice.

✓ **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.

✓ **Information which you store on your hard drives, memory sticks and other electronic storages.**

We collect information stored on electronic storages (for example, personal documents, photos, videos, applications, files and others) provided by you during repair or data recovery services.

✓ **Information about your software licence keys.**

We may request software license keys (for example, Windows activation keys, licence keys for antivirus software and others).

✓ **Information from online activities.**

We collect information about your internet browser settings or otherwise Internet Protocol (IP) and other relevant information to help us identify your geographic location when providing you with our services.

- ✓ **Other information which we may need for provide our services.** For example, if you ask us to set up your e-mail account through Microsoft Outlook we may ask you to provide us you e-mail account details (such as login and password).

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

- ✓ **When you ask us to provide you with certain products and services.** For example, Windows installation service requires us to collect your actual license keys from you. Or when you buy a product on our website we should request your name, telephone number, e-mail address and postal address for delivery.
- ✓ **When you use our website and visit our office.**
- ✓ **When you or others give us information verbally or in writing.** This information may be stored on your hard drive or memory stick, in records of your previous service requests or if you make a complaint.
- ✓ **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, including through games, videos or apps, (3) contact you through the social media services, and (4) enable you to share your experience and content via social media services. For a description on how social media services and other third party platforms, plug-ins, integrations or applications use your information, please refer to their respective privacy policies and terms of use, which may permit you to modify your privacy settings.
- ✓ **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 a request 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.**

For doing that, we use your information to:

- ✓ Establish your eligibility for our products and services.
- ✓ Process your requests for repair, data recovery or encoding services.
- ✓ Process payments that are paid to you or by you. For example, if you make a payment using your credit or debit card, we will share transaction details with our card payment provider.
- ✓ Contact you by post, phone, text message, email, social media, or fax.
- ✓ 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).
- ✓ 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 – for example, the models of your laptops you use, or where you consent, when you use our website, we may gather location information from your mobile phone or other electronic device you may use to interact with us.
- ✓ Conduct marketing activities.  
For example, running competitions, promotions and direct marketing (provided that you have not objected to us using your details in this way), and research, including customer surveys, analytics and related activities.
- ✓ To run our business on a day to day basis including to:
  - ✓ Carry out strategic planning and business portfolio management.

- ✓ Compile and process your information for audit, statistical or research purposes (including, in some instances, making your data anonymous) in order to help us understand trends in our customer behaviour and to understand our risks better, including for providing management information, operational and data risk 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.
- ✓ Enable our Group members to share or access your information for internal administrative purposes, audit, prudential, statistical or research purposes (including making your data anonymous) to help us understand trends in customer behaviour, for helping us to understand our risks better and for the purposes set out in this Data Privacy Notice (but not for the purposes of direct marketing where you have objected to this).
- ✓ **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.
  - ✓ Establishing your identity and residence in order to comply with law and regulation concerning taxation and the prevention of money laundering, fraud and terrorist financing.
  - ✓ We are required by law to screen applications that are made to us to ensure we are complying with the international fight against terrorism and other criminal activities. As a result, we may need to disclose information to government and other statutory bodies.
  - ✓ Preparing returns to regulators and relevant authorities including preparing income tax, capital gains tax, capital acquisition tax and other revenue returns.

- ✓ Complying with court orders arising in civil or criminal proceedings.
- ✓ Performing a task carried out in the public interest.
- ✓ **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 our us and/or our selected and trusted partners.
- ✓ Share your data with third parties so that they may send you electronic messaging about their products and offers.
- ✓ Use special categories of data, or sensitive data.
- ✓ Use your location data to send you information regarding special offers from us close to your location.
- ✓ 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. How we use automated processing or “analytics” & our legal basis**

We do not use any automated statistical analysis of the information we collect about you as part of our business.

## **6. 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:
  - ✓ These include your family members, business partners or colleagues.
- ✓ When you make a request for repair service:
  - ✓ We may pass your details to the software development company (such as Microsoft, Apple, ESET and others).
  - ✓ We may pass your detail to other companies for buying a necessary software or hardware.
  - ✓ We may request information relating to your sale history.



- ✓ We may disclose your information to our agents and other partners and third parties for administration, regulatory, customer care and service purposes, and to investigate or prevent fraud.

## 7. 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 products or services we have provided to you.

Those factors include:

- ✓ The type of product we have provided to you. For example, we may keep data relating to a provided service for a longer period compared to data regarding a purchased product.
- ✓ Whether you and us are in a legal or some other type of dispute with another person or each other.
- ✓ The type of data we hold about you.
- ✓ Whether you or a regulatory authority asks us to keep it for a valid reason.

**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 we keep your contact information for one (1) year, and personal information (such as a data stored on hard drives or memory sticks) for 4 (four) weeks.**

## 8. 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.
- ✓ We may not be able to continue to provide you with or renew existing products and services.

- ✓ 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.

## 9. 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 a contract that you have entered into 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.
- ✓ 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.
- ✓ Where authorised by law or regulation, we may undertake processing of special categories of data for a substantial public interest.
- ✓ Where the processing of criminal conviction data is authorised by EU or local law.

## 10. Processing your information outside the EEA

Your information is stored on secure systems within Company premises and with providers of secure information storage.

### Using companies to process your information outside the EEA.

Some of our service providers, for example IT companies (such as Microsoft, Apple and others) are based outside of the EEA. Where we authorise the processing/transfer of your personal information outside of the EEA, we require your personal information to be protected to at least Irish standards.

## 11. 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:

- ✓ Find out if we use your information, to access your information and to receive copies of the information we have about you.
- ✓ Request that inaccurate information is corrected and incomplete information updated.
- ✓ Object to particular uses of your personal data where the legal basis for our use of your data is our legitimate business interests (for example, profiling we carry out for our legitimate business interests) or the performance of a task in the public interest. However, doing so may have an impact on the services and products we can / are willing to provide.
- ✓ Object to use of your personal data for direct marketing purposes. If you object to this use, we will stop using your data for direct marketing purposes.
- ✓ Have your data deleted or its use restricted – you have a right to this under certain circumstances. For example, where you withdraw consent you gave us previously and there is no other legal basis for us to retain it, or where you object to our use of your personal information for particular legitimate business interests.
- ✓ Obtain a transferable copy of certain data to which can be transferred to another provider, known as “the right to data portability”.
- ✓ This right applies where personal information is being processed based on consent or for performance of a contract and the processing is carried out by automated means. You are not able to obtain through the data portability right all of the personal information that you can obtain through the right of access. The right also permits the transfer of data directly to another provider where technically feasible. Therefore, depending on the technology involved, we may not be able to receive personal data transferred to us and we will not be responsible for the accuracy of same.
- ✓ 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 (1) week**. If we are unable to deal with your request fully within a week (due to the complexity or number of requests), we may extend this period by **one (1) calendar month**. 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 or another supervisory authority.

You can contact the Office of the Data Protection Commissioner at <https://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

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

## 12. 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 61 418 384

**E-mail:** info@limerickcomputers.ie

**Postal Address:** Foxhill House, Old Dublin Road, Groody Hill, Limerick, V94 AEE7

## 13. Changes to this notice

We will update this Data Privacy Notice from time to time. Any changes will be communicated to you and made available on this page.