

GDPR – PROJECT SPECIFIC PRIVACY NOTICE

Agency Workers and External Personnel

This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you during your employment and after it ends. We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects the information

Colleen Construction Limited ('Company') is a 'data controller' and gathers and uses certain information about you. This information is also used by our affiliated entities and group companies (our 'group companies') and so, in this notice, references to 'we' or 'us' mean the Company and our group companies.

Data protection principles

- We will comply with the data protection principles when gathering and using personal information: we will process personal information lawfully, fairly and in a transparent manner;
- we will collect personal information for specified, explicit and legitimate purposes only, and will not process it in a way that is incompatible with those legitimate purposes;
- we will only process the personal information that is adequate, relevant and necessary for the relevant purposes;
- we will keep accurate and up to date personal information, and take reasonable steps to ensure that inaccurate personal information are deleted or corrected without delay;
- we will keep personal information in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the information is processed; and
- we will take appropriate technical and organisational measures to ensure that personal information are kept secure and protected against unauthorised or unlawful processing, and against accidental loss, destruction or damage.

About the information we collect and hold

The table set out in Schedule 1 summarises the information we collect and hold, how and why we do so, how we use it and with whom it may be shared.

We may also need to share some of the categories of personal information set out in 0 with other parties, such as external contractors and our professional advisers and potential purchasers of some or all of our business or on a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our regulators or as required to comply with the law.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Where information may be held

Information may be held at our offices and those of our group companies, and third party agencies, service providers, representatives and agents as described above. We have security measures in place to seek to ensure that there is appropriate security for information we hold.

How long we keep your information

We keep your information during and after your employment for no longer than is necessary for the purposes for which the personal information is processed. Further details on this are available in our [Data Retention Policy](#).

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Your Information rights including the right to object

Under the [General Data Protection Regulation](#) you have a number of important rights free of charge. In summary, these include rights to:

- fair processing of information and transparency over how we use your use personal information
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from Ireland's Data Protection Commissioner on individuals rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

email, call or write to **the Company Secretary**

let us have enough information to identify you e.g. your name, the organisation for whom you work etc

let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and

let us know the information to which your request

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in Ireland is the Data Protection Commissioner who may be contacted at <https://www.dataprotection.ie> or telephone: +353 761104800.

Changes to this privacy notice

This privacy notice was published on 25th May 2018.

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We may change this privacy notice from time to time, when we do we will inform you via e-mail.

How to contact us

Please contact the Company Secretary, if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us please send an email to construction@collen.com or write to The Company Secretary, Collen Construction Limited, River House, East Wall Road, Dublin 3 or call +35312434777.

Do you need extra help?

If you would like this notice in another format (for example: audio, large print, braille) please contact us (see 'How to contact us' above).

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SCHEDULE 1 ABOUT THE INFORMATION WE COLLECT AND HOLD

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name, contact details (i.e. address, home and mobile phone numbers, email address) and emergency contacts (i.e. name, relationship and home and mobile phone numbers) *	From you	Legitimate interests: to comply with legal, regulatory and corporate governance obligations	For management, planning and organisation of work
Details of your qualifications, skills and experience	From you	Legitimate interests: to comply with legal, regulatory and corporate governance obligations	To ensure you have the correct competences, skills and experience to carry out the task in the interests of safe working practices.
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information	From you and, where necessary, the DBEI	To comply with our legal obligations	To carry out right to work checks Information may be shared with the DBEI and or Garda National Immigration Buro
A copy of your driving licence	From you	To perform the employment contract To comply with our legal obligations To comply with the terms of our insurance policies	To ensure that you have a clean driving licence Information may be shared with our insurer
Information in your sickness and absence records (including sensitive personal information regarding your physical and/or mental health	From you, from your doctors, from medical and occupational health professionals we engage and from our insurance benefit administrators	To comply with our legal obligations Legitimate interests: to maintain health and safety records and to comply with legal, regulatory and corporate governance obligations	To comply with our legal obligations Information shared with your doctors, with medical and occupational health professionals we engage and with our insurance benefit administrators
Information on conduct issues involving you	From you, from other employees and from consultants we may engage in relation to the conduct procedure	To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations	To follow our policies, to monitor staff performance and conduct and to deal with disciplinary and grievance matters Information shared with relevant managers, HR personnel and with consultants/professional

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		and to ensure safe working practices	advisers we may engage
Details of your time and attendance records*	From you and from biometric ID systems used to record personnel on site for time-keeping, health and safety and employment legislation requirements	Legitimate interest: to monitor and manage site personnel access to our systems and facilities and to record absences. To comply with our legal obligations.	For management, planning and organisation of work Information shared with relevant managers, HR personnel and with consultants we may engage

**Please refer also to our [CCTV Policy](#)