

Informa Privacy Policy

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Introduction

This policy governs the use by ACE DRAUGHTING LTD, T/A INFORMA of any data you share with us whether by using our website hosted at 'informa.ie', submitting documents to us or otherwise engaging with our services.

We respect your privacy and are committed to protecting your personal data. This privacy notice will inform you as to how we use your personal data when you visit our website (regardless of where you visit it from) or otherwise share data with us and tell you about your privacy rights and how the law protects you.

Purpose of this privacy notice

This privacy notice aims to give you information on how ACE DRAUGHTING LTD, T/A INFORMA collects and processes your personal data through your use of this website, including any data you

may provide through this website when you sign up to a newsletter, purchase a product or service or apply to participate on any courses or programmes provided by us.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager by email – privacy@informa.ie.

You have the right to make a complaint at any time to the Data Protection Commissioner's Office (www.dataprotection.ie) being the supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the Data Protection Commissioner's Office so please email us at privacy@informa.ie.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 23/07/2019.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third Party Links

The Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

The Data We Collect

Personal data means any information relating to an identified or identifiable natural person. Personal data can be factual (for example, a name, address or date of birth) or it can be an opinion about that person, their actions and/or behaviour.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- i. Identity Data includes first name, last name, job title, company.
- ii. Contact Data includes billing address, delivery address, email address and telephone numbers.
- iii. Client Data includes information you provide to us which is relevant to the service which we are providing you with.
- iv. Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- v. Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

- vi. Usage Data includes information about how you use our website, products and services.
- vii. Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- viii. CV data - If you apply for a role advertised on our website, we will collect your CV data- employment history, education and training history. By emailing or otherwise submitting your CV to us at Informa you consent that that your personal data may be used by us for the purpose of considering you for a current position or similar positions that may become available in the future. Furthermore, you agree that we may use the contact details you provided to contact you by phone or email.
- ix. Recruitment data - we may record details about positions for which you have been put forward, interviews attended and interview feedback.

How is your Data Collected?

We may collect your data using one or more of the following:

- i. You may give us your Identity, Contact and Curriculum Vitae Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when we set you up as a client, you send us an email, contact us via website or you apply for advertised jobs, either directly or via a third party.
- ii. Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see our cookie policy for further details.
- iii. Third parties or publicly available sources. We may receive personal data about you from various third parties such as LinkedIn or other public forums, former employers in the context of reference checking or marketing lists.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please email us at privacy@informa.ie if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

The lawful basis of processing that we use are as follows:

- i. **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our

legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by emailing us at privacy@informa.ie

- ii. **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- iii. **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
- iv. **Consent** - we will only process your data when you have consented to it for one or more specific purpose. Your consent will be as easy to withdraw as it was to grant and processing your data will cease if your consent is withdrawn.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To process your application for an advertised position	(a) Identity (b) Contact (c) Curriculum Vitae	Consent where you apply directly to a job advertisement posted by us or on our behalf Legitimate Interest where we obtain your data from a 3 rd party pending our obtaining your Consent to be considered for a position.
To keep your data on file for ongoing Candidate placement services	(a) Identity (b) Contact (c) Curriculum Vitae (d) Recruitment	Consent
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting)	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or

and hosting of data)		group restructuring exercise) Necessary to comply with a legal obligation
To deliver relevant website content and marketing content	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Subject to our Cookie Policy. Marketing will be in accordance with your marketing preferences. Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Subject to our Cookie Policy. Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Consent

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email us at privacy@informa.ie.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Opting Out

You can ask us to stop sending you marketing messages at any time by emailing us at privacy@informa.ie at any time or by clicking the Opt-out/unsubscribe link in any of our marketing emails.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of other transactions.

Do we share your personal data with anyone else?

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- i. Service providers based inside and outside of EEA who provide IT and system administration services.
- ii. Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in Ireland who provide consultancy, payroll, banking, legal, insurance and accounting services.
- iii. Revenue, governmental agencies, regulators, grant authorities and other authorities acting as processors or joint controllers based in Ireland who require reporting of processing activities in certain circumstances or to whom we are obliged to share information about our organisation and participation in it.
- iv. Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We require all third parties to enter into a data processing agreement with us which complies with our obligations under the GDPR. This agreement requires third parties to have appropriate security systems in place and only to use your personal data on our instructions and in accordance with data protection law.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who

have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. We have procedures in place to deal with actual and suspected data breaches which include an obligation on us to notify the supervisory authority and/or you, the data subject, where legally required to do so.

Transferring Personal Data Abroad

There may be circumstances in which we will have to transfer your personal data out of the European Economic Area for the purposes of carrying out the services we provide to you. Where the need for such a transfer arises, we will always ensure that there are appropriate safeguards in place to protect your personal data such as:

- the European Commission has issued a decision confirming that the country to which we transfer the personal data ensures an adequate level of protection for the data subjects' rights and freedoms;
- appropriate safeguards are in place such as binding corporate rules (BCR), standard contractual clauses approved by the European Commission, an approved code of conduct or a certification mechanism, a copy of which can be obtained from the Data Protection Team;
- you have provided explicit consent to the proposed transfer after being informed of any potential risks; or
- the personal data is being transferred to a company in the US which has self-certified its compliance with the EU-US Privacy Shield which has been found by the European Commission to provide an adequate level of protection to the personal data of EU citizens.

For how long do we keep your personal data?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Where you ask to be unsubscribed from marketing communications we may keep a record of your email address and the fact that you have unsubscribed to ensure that you are not sent any further emails in the future.

Your Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You may:

Request access to your personal data. This is commonly known as a “data subject access request”. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of your personal data. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data. You may object where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights.

Request restriction of processing your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request transfer of your personal data to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Right to withdraw consent.

Where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please **email us at privacy@informa.ie**.