



DATA PROTECTION POLICY

BM GLASS COATINGS

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Overview

This policy is part of the BM Glass Coatings data protection program. This policy describes how BM Glass Coatings strives to meet its obligations to data subjects and to the legislation regarding the protection and proper use of personal data. BM Glass Coatings is committed to conducting business in accordance with the Data Protection Acts 1988 to 2018 and the EU General Data Protection Regulation in line with the highest standard of ethical behaviour. This policy addresses the core principles set out by the Office for Data Protection for compliance and good practice within the current Data Protection Legislation as mentioned above.

General Statement

The office of the Data Protection Commissioner and the European Union General Data Protection Regulation outline principles of data processing which are binding on all organisations who handle personal data. This policy demonstrates how BM Glass Coatings adheres to these principles.

Introduction

BM Glass Coatings is committed to conducting business in accordance with all applicable Data Protection law and regulations and in line with the highest standard of ethical behaviour. In addition to this policy, BM Glass Coatings takes particular care when handling the sensitive personal information entrusted to us by our clients.

Scope

The policy covers both personal and sensitive personal data held in relation to data subjects by BM Glass Coatings. The policy applies equally to personal data held in manual and automated form. All Personal and Sensitive Personal Data will be treated with equal care by BM Glass Coatings. Both categories will be equally referred-to as Personal Data in this policy, unless specifically stated otherwise.

Policy

BM Glass Coatings as a Data Controller

In the course of its daily organisational activities, BM Glass Coatings acquires processes and stores personal data in relation to:

- The Employees of BM Glass Coatings
- The Customers of BM Glass Coatings
- The Third Party service providers engaged by BM Glass Coatings

In accordance with the Irish Data Protection legislation, this data must be acquired and managed fairly. Not all staff members will be expected to be experts in Data Protection legislation. However, BM Glass Coatings is committed to ensuring that our staff members possess sufficient awareness of the legislation in order to be able to anticipate and identify a Data Protection issue, should one arise. In such circumstances, staff must ensure that the Data Protection Lead is informed, and in order that appropriate corrective action is taken.

Due to the nature of the services provided by BM Glass Coatings there is regular and active exchange of personal data between BM Glass Coatings

and its Data Subjects. This is consistent with BM Glass Coatings' obligations under the terms of its contract with its Data Processors.

This policy provides the guidelines for this exchange of information. In general terms, any staff member should consult with the Data Protection Lead to seek clarification on any Data Protection issue that arises where procedure isn't clear.

Fair Obtaining

BM Glass Coatings' aim for our data collection to be transparent at all times. At the time of collecting information about individuals, individuals are made aware of why their data is being collected, how it will be used and who will have access to it.

Purpose Limitation

Personal Data shall be collected for specified, explicit and legitimate purposes. Data shall not be further processed in a manner that is incompatible with those purposes unless further consent is given by the data subject.. Once this purpose has been completed, the data will be no longer retained by BM Glass Coatings and will be destroyed. Further information regarding the disposal of media can be retrieved by contacting the BM Glass Coatings' office.

Data Minimisation

The personal data collected by BM Glass Coatings will be adequate, relevant and limited to the personal data required for the purposes the data is being collected for. BM Glass Coatings will not collect, process or store any data that is not required for a specific purpose. When processing is complete, all

records will be destroyed in a manner that eliminates the possibility of reconstruction of the information.

Accurate, relevant and not excessive

The personal data collected by BM Glass Coatings will be accurate and maintained on a regular basis to ensure its accuracy. Every reasonable step will be taken by BM Glass Coatings to ensure that any data that is deemed inaccurate, having regard to the purposes for which the data is being processed, are erased or rectified with undue delay. BM Glass Coatings' employees who maintain personal data are responsible for its correction and maintenance on an ongoing basis. Reviews of personal data are conducted on a regular basis to ensure this principle is being complied with.

Storage Limitation

Personal Data shall be kept in a form which permits the identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data is processed. BM Glass Coatings will, where possible, store personal data in a way that prevents the data subject from being identified.

Integrity & Confidentiality

Personal data will be processed in a manner that ensures the use of maximum security measures. This includes protection against unauthorised access, unlawful processing and accidental or intentional loss, destruction or damage.

All personal data is maintained in a secure manner.

Human Resource Management System

- i. Human Resource paper files are maintained securely in locked cabinets with access controlled and limited to Human Resources Personnel
- ii. Electronic records are maintained securely with a secure password in place.

Device Security

- i. All Laptops for use with client personal data within BM Glass Coatings are encrypted.
- ii. All mobile phones for use with client personal data within BM Glass Coatings are password protected with access to the corporate applications restricted with the use of Multi Factor Authentication.

Disclosures to 3rd Parties and Consent for Secondary Uses

- i. Individuals are made aware of all disclosures to third parties, and consent is always sought for such disclosures prior to any data being disclosed.
- ii. Disclosures are typically related to the further provision of service to an individual.
- iii. Information disclosed to third parties may be in written or verbal form. All requests for information by individuals for information held on them by BM Glass Coatings are made using the procedure described in the section regarding Data Subject Rights in this policy.

- iv. Letters to external agencies containing personal data about an individual (e.g. letters of referral) form part of an individual's record and are maintained as part of the person's record.
- v. There are special circumstances under which disclosure of personal data to third parties is allowed. These are provided for under the Data Protection legislation and are:
 - a. As ordered by the Gardaí, or army personnel
 - b. For the purpose of investigating an offence
 - c. To protect the state's international relations
 - d. To prevent urgent injury or damage to person or property
 - e. Under a court order or other rule of law
 - f. Required for the purposes of obtaining legal advice or for legal proceedings in which the person making the disclosure is a party or a witness
 - g. Made at the request of and with the consent of the subject of the data

Accountability

BM Glass Coatings shall be responsible for, and be able to demonstrate, compliance. This principle requires BM Glass Coatings to be able to demonstrate that all of the principles above are met for **all** personal data held by the organisation.

Data Subject Rights

All individuals have the right to access all the personal data held on them by BM Glass Coatings. According to the EU General Data Protection Regulation Chapter III Section 3, data subjects also have the right to rectify the data held

on them by BM Glass Coatings, the right to have the data erased if the data is not required to be kept by a contractual agreement or relevant legislation, the right to restrict processing, the right to data portability and the right to object.

The exercising of these data subject rights is important to BM Glass Coatings and any desire to exercise these rights can be done by contacting our Data Protection Lead, Bryn Maine. BM Glass Coatings takes the stance that individuals may need assistance to request access to their own personal data. BM Glass Coatings will provide advice on the easiest route to achieve this.

Data Retention

To ensure fair Processing, personal Data will not be retained by BM Glass Coatings for longer than necessary in relation to the purposes for which it was originally collected. This takes into account the legal and contractual requirements, both minimum and maximum, that influence the retention periods set forth in the schedule. All Personal Data should be deleted or destroyed as soon as possible where it has been confirmed that there is no longer a need to retain it.

Training & Education

This policy is circulated to all new staff as part of the induction process and was circulated to all staff upon its creation. Data Protection training is provided to all staff upon commencement of employment and refresher courses are offered on a regular basis. Data Protection training is mandatory for all staff who are controllers or processors of personal data. Awareness of

Data protection issues are given through updates from the Data Protection Lead.

Co-Ordination and Compliance

The Data Protection Lead is currently Bryn Maine. All staff have been made aware of this role through email updates.

All breaches of this policy are to be reported to the Data Protection Lead without delay.

A formal review by the co-ordinator of data protection activities within BM Glass Coatings will take place annually across the organization

Complaints Handling

Data Subjects with a complaint regarding the processing of their personal data should put forward the matter in writing to the Data Protection Lead and the Office of Data Protection. An investigation of the complaint will be carried out by the Data Protection Commission and BM Glass Coatings to the extent that is appropriate based on the merits of the specific case. The Data Subjects will be made aware of the progress and the outcome of the complaint within a reasonable period.

If the issue cannot be resolved through consultation between the Data Subject and the Office of Data Protection, then the Data Subject may, at their option, seek redress through mediation, binding arbitration, litigation, or via complaint to the Data Protection Authority within the applicable jurisdiction

Breach Reporting

Any individual who suspects that a personal data breach has occurred due to the theft or exposure of personal data must immediately notify the Data Protection Commission and the Data Protection Lead within BM Glass Coatings, Bryn Maine providing a description of what occurred. Notification of the incident can be made via e-mail or by calling the BM Glass Coatings office and the office of the Data Protection Commissioner. The Office of Data Protection will investigate all reported incidents to confirm whether or not a Personal Data Breach has occurred. If a Personal Data Breach is confirmed, the Office of Data Protection will follow the relevant authorised procedure based on the criticality and quantity of the Personal Data involved. For severe Personal Data Breaches, the BM Glass Coatings Data Protection Lead will initiate and chair an emergency response team to coordinate and manage the Personal Data Breach response.