



**DATA PROTECTION**

**AND**

**PRIVACY STATEMENT**

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## 1.0 INTRODUCTION

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At **AnoisHR** (Company registration number 465420), (“we”, “us” “our”), privacy and data protection rights are very important to us. We are fully committed as Data Controller to protecting your personal data in compliance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) EU Regulation 2016/679.

Data Protection is the safeguarding of the privacy rights of individuals in relation to the processing of personal data, in both paper and electronic format. The Regulations lay down strict rules about the way in which personal data is collected, stored, accessed, used and disclosed.

Any information that you may be asked to provide via our website, or through other means of data collection, will only be used as outlined in this statement.

As a data subject you have following rights:

- To have your personal data obtained and processed fairly.
- To have personal data kept securely and not illegitimately disclosed to others.
- To be informed of the identity of the Data Controller and of the purpose for which the information is held.
- To get a copy of your personal data which you have provided in a structured, commonly used and machine-readable format if requested within thirty (30) days from the request.
- To have your personal data corrected if inaccurate.
- The right to Erasure where the personal data is no longer necessary for the purposes it was collected or for compliance with our legal obligations.
- To prevent your personal data from being used for certain purposes apart from contractual purposes.
- If you are not satisfied with how we manage your personal data, you have a right to make a complaint to the Data Protection Commissioner ([www.dataprotection.ie](http://www.dataprotection.ie)).

This Statement is to help you make an informed decision as to whether you do wish to submit any such personal data to us.

Please read this Statement carefully to understand our practices relating to your personal data and how we will treat same.

**If you do not accept that we process your data in the manner detailed in this policy, please do not submit any personal data to us.**

## **2.0 COLLECTING PERSONAL DATA**

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### **2.1 Grounds of Data Collection:**

Collection and processing your personal data are required for the performance of our contractual obligations towards you and providing you with our services. It is also necessary for the compliance with our legal and financial obligations as a controller.

If it becomes necessary to change the purpose for which the data is processed, the data subject shall be informed of the new purpose before any processing occurs.

We will never collect your personal information in a way that is unlawful or where we have no legitimate basis for using that personal information.

### **2.2 Purpose and Scope of Data Collection:**

Personal Data is defined by the General Data Protection Regulations (EU Regulation 2016/679) as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

#### 2.2.1 Job Seekers:

We will collect personal data and such personal data will generally consist of your name, contact details and other information contained in other documentation submitted which may include your CV/Resume. You may also need to provide your bank details or debit/credit card details or pay by means of Stripe and/or PayPal for the career services we deliver.

The personal data will be requested, stored, processed, and disclosed by us for the following purposes:

- Evaluate data about you in the carrying out of any of our career support services and/or against job vacancies which may be suitable for you,
- Interact with you in writing, online, by email or telephone/video for any of our career services, recruitment services and/or recruitment activity for our business.
- Send your data to our clients to put your candidacy forward for job vacancies available and potentially suitable and/or to assess your eligibility for job vacancies that we and/or our clients may have for you.
- We may also seek your explicit consent either on behalf of any of our client(s) or us directly; to Process sensitive Personal Data should you progress further in any selection process with us or any of our client(s).
- We may use your information to improve our services and products.
- Communicate with you generally about career support services and any relevant job opportunities.

- Where we or our clients have engaged third parties to deliver services that have been requested. These may include references, qualifications, criminal reference, pre-employment medicals, etc. You will be advised in advance as a part of the process and you will have an option to decline. You should note also that it is your responsibility to attain consent from any referees; prior to submitting to us any personal information about them.
- We may be required by law to disclose your data to third parties in relation to detection of crime, collection of taxes and duties or in order to comply with any applicable laws and orders.

This list is not exhaustive and we may seek to process, use or disclose your data for any other purpose which has not been listed, providing it is necessary for the performance of our contract with you, you have given us your consent or it is necessary for performance of our legal obligations.

### 2.2.2 Employers / Partners / Affiliates / Associates / Vendors / Suppliers:

We will collect personal data which will generally consist of your name and contact details, including business email address, telephone number and demographic information. The Company may request further information including for payment / bank details typically via Stripe and/or PayPal or other credit transfers. The personal data will be requested, stored, processed and disclosed by us for the following purposes:

- *HR Services and Products:* We also reserve the right to select and contract with third party service providers (including our Partners/Affiliates/Associates) for any specific services to Process any such related data on our behalf; within appropriate security measures.
- *Arranging demos:* of HR and ATS software systems: that you may be interested in purchasing for your business or delivering to our potential clients.
- *Access to your HR or ATS software systems:* For the purpose of processing your employees' data as requested by you for undertaking any of our HR Services.
- *To survey your experiences:* Of our career services and recruitment services, sales and/or marketing process(es), where relevant with a view to making any further enhancements/changes appropriate.
- *We reserve the right to select and contract:* With our trusted third-party service providers to undertake and/or provide any HR services and products on our behalf.
- *Interacting with you:* either in writing, online and/or by telephone/video regarding HR Services and/or Products.
- *Bank details:* For payment of HR products and/or services which you avail of and/or submitting your bank details to us as payment for our products and services.

The above list in this section is not exhaustive and we may seek to process, use or disclose your data for any other purpose which has not been listed; providing it is necessary for the performance of our contract with you, you have given us your consent or is necessary for the performance of our legal obligations.

## 2.3 How we Collect Data

We use various methods of collection of personal data:

- We may collect data via the Enquiry / Contact Us page of our website or obtained separately via email, including any of our general mail circular communications, Zoom, LinkedIn, Facebook, etc.
- You may also disclose your personal data to us by filling in the Forms or by corresponding with us by post.
- Or by subscribing to our newsletter/marketing mailing lists.
- Or by requesting a service report.
- As you interact with our website, we may collect technical information about you by using cookies, please refer to [section 8.0](#) on our Cookies Policy.
- We may also collect your data through third party service providers or publicly available sources.

## 3.0 KEEPING DATA SAFE AND SECURE

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### 3.1 Security and Disclosure Controls:

Where we may act as both data controller and data processor all personal data will be treated with equal care as outlined in this Statement.

We are committed to adhering to strict security procedures of GDPR standards in the storing and disclosure of personal information that you provide to us with appropriate electronic procedures and restricted access to authorised users only to safeguard and protect the data collected online. This also includes password protection, firewalls IP anonymization and SSL card/encryption to verify authenticity of our website for electronic data between sender and receiver.

All Personal Data recorded by the Company is audited once every twelve (12) months or sooner as may be necessary, so that we only keep relevant information ensuring that it is accurate and is kept for no longer than is necessary.

### 3.2 Transferring Personal Data:

We may engage other Data Processors to process personal data on its behalf.

In each case, a formal, written contract is in place with the Processor, outlining their obligations in relation to the Personal Data, the specific purpose or purposes for which they are engaged, and the understanding that they will process the data in compliance with the Irish Data Protection legislation and GDPR. Failure of a Data Processor to manage data in a compliant manner will be viewed as a breach of contract and will be pursued through the courts.

In connection with the purposes outlined above, we might be required to transfer your personal data outside the European Economic Area. If and to the extent that we are required to do so, we will ensure that appropriate measures are in place to comply with our obligations under the applicable law covering such transfers. This may include entering into a contract governing the transfers that contains the “standard contractual clauses” approved for this purpose by the European Commission.

If you would like to receive further details of the measures, please contact us (refer to [section 10.1](#)).

### **3.3 Third Party Analytics:**

Please refer to our separate Cookies policy (where visitors to our website are prompted automatically to view and select choices each time our website is uploaded); which includes information on how we use third party website analytics services. (See also [section 8.0](#)).

## **4.0 KEEPING DATA ACCURATE, COMPLETE AND UP TO DATE**

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Whilst we have measures in place to ensure high levels of data accuracy, it is the responsibility of the data subject to keep us informed of any changes to be made to your personal data.

Personal data held by us is adequate, relevant and not excessive in relation to the purposes for which it is kept. We will never request or hold data that is not required.

## **5.0 CONTROLLING YOUR PERSONAL DATA**

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As set out under Article 15 of the GDPR 2018, you have the right to submit a Data Access Subject Request (“DASR”), to obtain a copy of any Personal Data relating to you and retained by us.

You may contact us at any time to request access/attain a copy of your personal data, which we hold about you.

Should you wish to make a request, you must please submit your request in writing by post or by email to our GDPR Administration Officer. (Refer to [section 10.1](#) for contact information).

To help us answer your request please be as specific as possible about the information you wish to receive and the format you wish to receive it. You must also please provide evidence of your personal identification.

While there is typically no charge for a request, if the request is excessive, we may charge a reasonable fee, which shall be based on the legitimate administrative cost, details of which shall be provided to you.

We have implemented a Subject Access Request procedure by which to manage such requests in an efficient and timely manner, currently within thirty (30) days. There may be an extension of two (2) months where any such request is complex.

We also reserve our right to contact you when reviewing your personal data – in order to update/correct your personal data, as may be necessary.

Please note that a Subject Access Request(s) may be subject to certain restrictions in some circumstances.

## **6.0 DATA SECURITY BREACH**

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We have procedures in place to manage any data security breaches.

The Data Protection Commissioner is notified within seventy two (72) hours of the data breach coming to our attention.

Where a personal data breach occurs, which is likely to result in a high risk to the rights and freedoms of a data subject, we shall, without undue delay, notify the data subject.

## **7.0 WITHDRAWAL OF CONSENT**

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Where our processing of your personal information is based on you having provided your consent, you have a right to withdraw such consent.

You can withdraw your consent by submitting your request in writing by post or email to our GDPR Administration Officer. (Refer to [section 10.1](#) for contact information).

Withdrawal of consent will not affect the lawfulness of any prior processing we have conducted.

### **7.1 Job Seekers:**

By reason of freely submitting your personal data in accordance with this Statement through the Enquiry Form (located on the '**Contact Us**' page of our website) or separately via email to us, your personal data is entered onto our internal database and you are therefore authorising us to control and/or process; solely for any/all of our Career Services, Recruitment for any of our clients or ourselves as may be appropriate and all communications in this regard by email, telephone and/or zoom (or other similar service).

Failure to provide us with sufficient information might result in our inability to complete any of our Career Support services or assessment for recruitment purposes or form any potential future client and/or employment relationship.

On acceptance of offer of employment, your personal data will become part of your employment record for employment purposes.



## **7.2 Employers / Partners / Affiliates / Associates / Vendors / Suppliers:**

By freely submitting your Personal Data through the Enquiries portal of our website and/or by email or any other provisions as set out in this statement, this information is entered onto our searchable database. You are thereby authorising us to process for any/all of your HR Services and Products enquiries, services and products and communicate generally thereafter.

Failure to provide us with sufficient information might result in our inability to complete any of our HR services and/or products or form any potential future client working relationship.

## **8.0 COOKIES POLICY**

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Our Cookies policy forms part of our overall Data Protection and Privacy Statement. For information including the purpose and how we use cookies technology as well as certain options whilst navigating through our website; please refer to the full Cookies policy located on our website (where visitors are automatically prompted to view and select cookies choices each time our website is uploaded).

## **9.0 MARKETING MAILING LISTS**

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### **9.1 All Groups**

We will only contact you with your explicit consent for marketing or promotional purposes of any of our services and products. You can withdraw your consent at any time. Furthermore, we do not trade email lists with other parties.

You may decide how much marketing material about our services and/or products you wish to accept. You may subscribe or subsequently unsubscribe and change your preference at any time; either at the footer of our general marketing emails regarding any promotional / special offers or by separate email. We may use a third party provider to deliver our general emails.

### **9.2 Job Seekers**

We may also consider/contact you about potentially suitable/relevant opportunities to your experience/interests/requirements with us directly and/or any of our client businesses, after delivery of any of our career services; which may include a role(s) that you may or may not have already applied for directly or for other additional career related services; and will seek your explicit consent to do so.

## 10.0 FURTHER INFORMATION, COMPLAINTS AND REVIEWS

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### 10.1 Further Information:

In addition to via the 'Enquiry/Contact Us' portal of our website. If you have any requests or concerns regarding this Statement, including how your personal information is controlled and processed; as well as how to subscribe or unsubscribe to any of our marketing mailing lists, you may also contact our GDPR Administration Officer.

Enquiries should be made in writing (by post or email) to:

**GDPR Administration Officer,  
AnoisHR,  
9 Dromin Court, Dromin Road,  
Nenagh, Co. Tipperary,  
E45 K796, IRELAND.**

Email: [gdpr@anoishr.com](mailto:gdpr@anoishr.com)

### 10.2 Complaints:

In any event that you might be dis-satisfied with how your personal data is controlled and processed by us, you may make a complaint to us directly (refer to [section 10.1](#)); or to the Data Protection Commissioner (by post or via the DPC website) as follows:

**Data Protection Commissioner,  
21 Fitzwilliam Square South,  
Dublin 2,  
DO2 RD28, IRELAND.**

Web Form Link: [Data Protection Commission](#)

### 10.3 Statement Reviews:

This Statement will be reviewed regularly, considering any legislative or other relevant indicators, including any changes in business operations or practices. Any updates to this Statement will be uploaded onto our website so that you are kept fully up to date and we therefore recommend you check our website from time to time to ensure you remain satisfied with how your personal information is or will be managed by us.

Your continued use of our services, following the notification of the amendments, constitutes your acknowledgement and consent to said amendments.

Last updated on: 15<sup>th</sup> February 2021