



1. Introduction

Vertigo Inspection (ROI) Limited (trading as Irish Engineering Services) use personal data to provide our Testing, Inspection and Certification services. We will only process personal data in a manner that complies with the EU General Data Protection Regulations (Regulation (EU) 2016/679), commonly referred to as GDPR.

As defined by GDPR, personal data relates to a natural person ('data subject') who can be identified from that data. Identification can be directly from the information alone or indirectly from any other information in our possession or likely to come into our possession that can be used to identify an individual. Such information can include the data subjects name and contact details. It may also include information about how our websites and other applications are used.

2. Who is responsible for personal data?

Vertigo Inspection (ROI) Limited is responsible for your data. Our registered office is First Floor, Riverside Two, 43-49 Sir John Rogerson's Quay, Dublin 2. We are registered as a company in Ireland under company number 566073. We are the data controller of the personal data that we collect and process. The Chief Risk Officer is accountable for establishing the framework to control the way personal data is collected, the purpose for which it is used and processed by us.

3. How we process personal data?

As a Data Controller, Vertigo Inspection (ROI) Limited is responsible for compliance with its obligations by ensuring that personal data is processed lawfully, protected from loss, misuse, unauthorised access and disclosure, excessive amounts of data are not collected or retained, kept up to date, stored and destroyed securely and by ensuring that appropriate security measures are in place to protect personal data, specifically:

- a) Processed lawfully, fairly and in a transparent manner in relation to individuals
- b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- d) Accurate and, where necessary, kept up to date
- e) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

4. How we collect personal data

Depending on how our services, websites or applications are used personal data can be collected from our customers, suppliers, leads, employees or other third parties. Examples of how this personal data can be collected include but not limited to, the following:

- Job applications to join Vertigo Inspection (ROI) Limited - recruitment, screening and vetting forms, identity documents
- Customer or supplier information provided - terms and conditions of contracts, contact details
- Communication – letters, emails, telephone calls, messages through our on-line social media platforms

Approved for Use by:
Chief Risk Officer

Approved for Issue by:
Quality Assurance Manager

UNCONTROLLED WHEN PRINTED

BMS Manual
Page 1 of 5



- Computer records – usage of our website and other applications
- Offices - CCTV images are recorded at our locations
- Media including photographic or other images

5. Purpose and legal basis for processing personal data

We only process personal data if we have a valid lawful reason for doing so. This is to enable us to carry out our business activities, market, promote and advertise our services, maintain our own accounts and records, support and manage our employees – past, present or future. Our legal basis for processing personal data will comply with at least one or more of the following conditions:

- a) Consent - the consent of the data subject is freely given, specific, informed and unambiguous by clear explicit means for one or more specific purposes.
- b) Contract - processing essential to the performance of a contract or steps required to enter into a contract such as a contract of employment or contracts with customers or suppliers.
- c) Legal Obligation - compliance with a legal obligation to which the Data Controller is subject.
- d) Vital Interests - when necessary to protect the vital interests of a data subject or other natural person– such as an emergency or urgent situation.
- e) Public Interest - when necessary in the public interest or exercise of authority vested in the controller. An example would be release of data to the police or Health and Safety Authority.
- f) Legitimate Interests - legitimate interests pursued by the data controller or other third party, for example corporate governance and legal compliance.

6. Special categories of ‘sensitive personal data’

In addition to satisfying the legal basis for processing personal data above, processing of ‘sensitive personal data’ such as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation. will be prohibited unless one of the following conditions is met:

- The data subject has given explicit consent
- Processing is necessary for carrying out obligations under employment, social security, or social protection law, or a collective agreement
- Processing is necessary to protect the vital interests of a data subject or other natural person where the data subject is physically incapable of giving consent
- Processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation or not-for-profit body
- Processing relates to personal data which are manifestly made public by the data subject
- Processing is necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity
- Processing is necessary for reasons of substantial public interest
- Reasons of public interest in the area of public health
- Processing is necessary for reasons of preventative or occupational medicine, for assessing the working capacity of an employee, medical diagnosis, the provision of health or social care or treatment / management of health

Approved for Use by:
Chief Risk Officer

Approved for Issue by:
Quality Assurance Manager

UNCONTROLLED WHEN PRINTED

BMS Manual
Page 2 of 5



7. Record of processing

Depending on how our services, websites or applications are used personal data can be collected from our customers, suppliers, leads, employees or other third parties. Examples of how this personal data can be processed include, but not limited to, the following :

- Provision of our services to customers including Testing, Inspection and Certification services
- Marketing, sales and promotion of our services
- Contact details of our customers and suppliers
- Managing our Accounts
- Managing our Personnel Records
- Managing our staff, contractors or other third parties employed by Vertigo Inspection (ROI) Limited; and
- Use of CCTV systems to monitor and collect visual images for the purpose of security, crime prevention and detection and for the safety of our staff and the public

8. Sharing of personal data

We may be required to share personal data with, or obtain personal data from third parties as a direct consequence of our business activities and only necessary information is shared. For example, with:

- Government authorities such as the Health and Safety Authority
- Service partners, sub-contractors or suppliers who provide services to us
- Clients and customers who restrict access to their sites for security and/or health and safety reasons
- Training providers and accrediting bodies
- Consultants

9. How long we keep personal data

We keep your data only for as long as we need it. How long we need data depends on what we are using it for, whether that is to provide services to you, for our own legitimate interests and business requirements or so that we can comply with legal requirements. We will actively review the information we hold and when there is no longer a legal or business requirement for us to hold it, we will either delete it confidentially or, in some cases, anonymise it.

10. How we ensure the security of personal data

Vertigo Inspection (ROI) Limited takes the security of its personal data very seriously. We have security protocols to ensure we handle data appropriately and protect it from accidental loss or misuse. We use technical measures such as secure servers and password protection to safeguard data and the systems they are held in. We only permit access to information where there is a business requirement to do so.

11. Automated decision making

Vertigo Inspection (ROI) Limited do not process data solely by automated means.

12. Transfer of data abroad

Where Vertigo Inspection (ROI) Limited transfer personal data outside of the European Economic Area (EEA), this is done so in accordance with EU Commission Standard Contractual Clauses.

Approved for Use by: Chief Risk Officer	Approved for Issue by: Quality Assurance Manager
UNCONTROLLED WHEN PRINTED	BMS Manual Page 3 of 5
This document must not be copied, loaned or transferred; nor must the information it contains be disclosed to a Third Party without authorisation	



13. Further processing

If Vertigo Inspection (ROI) Limited wishes to process your personal data for a new purpose, not covered by this privacy notice, then we shall provide you with a new Privacy Notice explaining this new purpose prior to commencing the processing and setting out the relevant purpose and processing conditions. Whenever necessary we will seek your prior consent to the new processing.

14. Data Subject rights

As a Data Subject you have the right to:

- Request a copy of your personal data which Vertigo Inspection (ROI) Limited holds about you
- Request that the Data Controller corrects any personal data that is found to be inaccurate or out of date
- Request your personal data is erased where it is no longer necessary to retain such data
- Withdraw our consent to processing at any time – if consent is relied upon as a processing condition
- Request that the Data Controller provide the data subject with their personal data and where possible to transmit that data directly to another Data Controller (Data Portability)
- Request that a restriction is placed on further processing where there is a dispute in relation to the accuracy or processing of your personal data,
- Object to the processing of personal data – where processing is based on legitimate interests
- Lodge a complaint with the Data Protection Commissioner

15. Right to be informed

If your personal data is not obtained directly from you, Vertigo Inspection (ROI) Limited will provide you with the following additional items of information within one month of having received your personal data:

- The categories of personal data we are processing
- The source from where the personal data originates and whether it came from publicly accessible sources

16. Key contacts

To exercise any of your rights, or if you have any complaints concerning the processing of your personal data, please email us at data.protection@briteng.co.uk or write to us at Data Protection, Vertigo Inspection (ROI) Limited, First Floor, Riverside Two, 43-49 Sir John Rogerson's Quay, Dublin 2.

When you get in touch, we will respond as soon as possible and where possible within one month. However, if your request is more complicated, it may take longer to come back to you but we will come back to you within two months of your request. There is no charge for most requests, but if you ask us to provide a significant amount of data for example we may ask you to pay a reasonable administration fee. We will also ask you to verify your identity before we provide any information to you.

17. The independent regulator for data privacy is the Data Protection Commissioner

Please note that you have the right to lodge a complaint with the supervisory authority which is responsible for the protection of personal data in the country where you live or work, or in which you think a breach of data protection laws might have taken place.

In Ireland please contact the Data Protection Commissioner by telephone on +353 (0761) 104 800 or via their website: www.dataprotection.ie.

Approved for Use by: Chief Risk Officer	Approved for Issue by: Quality Assurance Manager
UNCONTROLLED WHEN PRINTED	BMS Manual Page 4 of 5
This document must not be copied, loaned or transferred; nor must the information it contains be disclosed to a Third Party without authorisation	

 IRISH ENGINEERING SERVICES	BUSINESS MANAGEMENT SYSTEM	00-00-M03-12 Version No. 2 Jan 2021
	DATA PROTECTION PRIVACY NOTICE	

Version Control/History

Date	Version No.	Description
May 2018	1	New Policy
Jan 2021	2	Reviewed and updated to reflect requirements associated with end of Brexit transition period.

Approved for Use by: Chief Risk Officer		Approved for Issue by: Quality Assurance Manager	
UNCONTROLLED WHEN PRINTED		BMS Manual Page 5 of 5	
This document must not be copied, loaned or transferred; nor must the information it contains be disclosed to a Third Party without authorisation			