

## Privacy Policy

In respect of

E. McMullan Ltd

E. McMullan Ltd is committed to protecting and respecting your privacy.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed, stored and disclosed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <http://emcmullan.co.uk/> (the **Site**) or using any services offered through or associated with our Site (the **Services**), you are deemed to have accepted and consented to the practices described in this policy.

The Site is owned and operated by E. McMullan Ltd (NI051148) of 292b Townhill Road, Rasharkin, Ballymena, BT44 8RW (our **Company Address**). E. McMullan Ltd trades at 61b Townhill Road, Portglenone Ballymena County Antrim, BT44 8AG.

E. McMullan Ltd processes personal data as a Data Controller as defined in the Data Protection Law Enforcement Directive and the General Data Protection Regulation (**GDPR**). E. McMullan Ltd has a Data Protection Manager who is responsible for matters relating to privacy and data protection. This Data Protection Manager is Paul O'Donnell and they can be reached at paulodonnell@lifetimedatasolutions.com.

The Site contains links to and from the websites of our partner networks, advertisers and affiliates or to websites shared by other users. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## 1. Data We Collect About You

We collect and process personal information so we can provide our Services to you or consider your job application. It's 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.

The data we collect and process about you is explained in the sections below.

### 1.1. Data You Give Us

**1.1.1.** You give us information about you by corresponding with us by email or otherwise. This includes information you provide when you use the Site, purchase our Services, submit a CV or where we provide our Services to you.

**1.1.2.** The information you give us includes names, address, email address, telephone number, date of birth, education history, gender and employment information.

**1.1.3.** We rely upon legitimate business reasons to use and process the data described above. This data is necessary for our legitimate interests and for us to fulfil our contractual obligations to you, and we rely on this as a lawful basis to use and process the data described above.

## 2. How We Use Your Data

**2.1.** We use your data to carry out our Services and operate our Site, in the following ways:

**2.1.1.** To provide you with information you request from us, and to carry out any other obligations arising from any contracts entered into between you and us.

**2.1.2.** To ensure that content from our Site is presented in the most effective manner for you and for your device.

**2.1.3.** To respond to communications from you and to provide you with information about our Services, including notifying you about changes to our Site or Services.

**2.2.** We also use your data to make our Site and Services better in the following ways:

**2.2.1.** To administer the Site and for internal operations.

- 2.2.2. As part of our efforts to keep the Site safe and secure, e.g. by conducting analysis required to detect malicious data and understand how this may affect your IT system.
- 2.3. We will not send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under applicable data protection laws.
- 2.4. If you are an existing customer, we will only contact you by electronic means (email or SMS) with information about services similar to those which were the subject of a previous enquiry by you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have expressly consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please notify us in writing or by email at [eoinmcmullan@emcmullan.co.uk](mailto:eoinmcmullan@emcmullan.co.uk).

### 3. How We Secure Your Data

- 3.1. All of your personal information is protected and we have put in place appropriate physical, electronic, and management procedures to safeguard and secure the data we collect. Your information is stored on secure internal storage. Your information is only accessible by employees who have authorised access rights to such information.
- 3.2. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your information, we use strict procedures and the security features described above to try to prevent unauthorised access.

4. **How Long We Store Your Data.** We only keep your personal information for as long as it's necessary for our original legitimate purpose for collecting the information and for as long as we have your permission to keep it.

## 7. Your Rights

### 7.1. Lawful Bases

7.1.1. We will ensure that your personal data is processed lawfully, fairly, and transparently and that it will only be processed if at least one (1) of the following bases applies:

7.1.1.1. You have given your clear consent to the processing of your personal data for a specific purpose.

7.1.1.2. Processing is necessary for the performance of a contract to which you are a party (or for us to take steps at your request prior to entering into a contract with you).

7.1.1.3. Processing is necessary for our compliance with the law.

7.1.1.4. Processing is necessary to protect someone's life.

7.1.1.5. Processing is necessary for us to perform a task in the public interest or in the exercise of official authority and the task/function has a clear basis in law.

7.1.1.6. Processing is necessary for our legitimate interests or the legitimate interests of a third party, except where there is a good reason to protect your personal data which overrides those legitimate interests, such as allowing us to effectively and efficiently manage and administer the operation of our business, maintaining compliance with internal policies and procedures, monitoring the use of our copyrighted materials, offering optimal, up-to-date security and obtaining further knowledge of current threats to network security in order to update our security.

## 7.2. Data Subject Rights

7.2.1. Under the GDPR, you have the right to:

7.2.1.1. Withdraw your consent to the processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason for doing so (such as to comply with a legal obligation).

7.2.1.2. Be informed of what data we hold and the purpose for processing the data, as a whole or in parts.

7.2.1.3. Be forgotten and, in some circumstances, have your data erased by ourselves and our affiliates (although this is not an absolute right and there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it).

7.2.1.4. Correct or supplement any information we hold about you that is incorrect or incomplete.

7.2.1.5. Restrict processing of the information we hold about you (for example, so that inaccuracies may be corrected—but again, there may be circumstances where you ask us to restrict processing of your personal data but we are legally entitled to refuse that request).

7.2.1.6. Object to the processing of your data.

7.2.1.7. Obtain your data in a portable manner and reuse the information we hold about you.

**7.2.1.8.** Challenge any data we use for the purposes of automated decision-making and profiling (in certain circumstances—as above, there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to refuse that request).

**7.2.1.9.** Complain to a supervisory authority (e.g. the Information Commissioner’s Office (ICO) in the UK) if you think any of your rights have been infringed by us. (We would, however, appreciate the chance to address your concerns, so please contact us prior to taking this step).

**7.2.2.** You will not have to pay a fee to access your personal data (or to exercise any of the other rights) unless your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

**7.2.3.** You have the right to ask us not to process your personal data for marketing purposes. We will get your express opt-in consent before we use your data for such purposes or share your personal data with any third parties for such purposes, but you can exercise your right to prevent such processing by contacting us at the Company Address, via email at [eoinmcmullan@emcmullan.co.uk](mailto:eoinmcmullan@emcmullan.co.uk).

**7.2.4.** You may revoke your consent for us to use your personal data as described in this Privacy Policy at any time by emailing us at [eoinmcmullan@emcmullan.co.uk](mailto:eoinmcmullan@emcmullan.co.uk), and we will delete your data from our systems. To enforce any of the above rights, please contact us at our Company Address or via email at [eoinmcmullan@emcmullan.co.uk](mailto:eoinmcmullan@emcmullan.co.uk).

**7.2.5.** We will notify you and any applicable regulator of a breach of your personal data when we are legally required to do so.

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**Changes To Our Privacy Policy** Any changes we may make to our Privacy in the future will be posted on this page and, where appropriate, notified to you by email. You will be deemed to have accepted the terms of the updated Privacy on your first use of the Site following the alterations. Please check back frequently to see any updates or changes to our Privacy Policies.

**Contact** Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to our Company Address or to our email at [eoinmcmullan@emcmullan.co.uk](mailto:eoinmcmullan@emcmullan.co.uk).