

About Us:

Sentry Consulting Ltd t/a Datascan and Datascan Redaction Services provides a range of document and information processing services on behalf of its customers. For these services we are the Data Processor or the Sub-Processor of the data and we are party to a Data Processing Agreement.

We are the controller for personal data gathered under certain circumstances which will be addressed in the following privacy policy.

Introduction

This policy governs the use by Datascan Document Services and Datascan Redaction Services of any data you share with us whether by using our websites www.DataScan.ie and/or www.DataScanRedaction.ie by submitting documents or information to us or otherwise engaging with our services.

We respect your privacy and are committed to protecting your personal data.

This privacy notice details to you 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 Datascan Document Services and Datascan Redaction Services 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 any of our services or when you apply for any position of employment with us.

Contact Person in relation to Data Protection & Privacy

If you have any questions about this privacy notice, including any requests to exercise your rights under GDPR please contact the CEO, Orla Cafferty by email – DataPrivacy@Datascan.ie

Reporting Concerns:

You may have concerns about how we process your data and we would welcome the opportunity to discuss this with you - please email us at DataPrivacy@Datascan.ie

You have the right to make a complaint at any time to the Data Protection Commissioner's Office (www.dataprotection.ie)

Changes to the Data we hold on you:

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.

What Data do we collect?

Personal data means any information relating to an identified or identifiable natural person.

We may collect, use, store & transfer different kinds of personal data that we have grouped as follows:

1. Identity Data includes first name, surname, job title, company.
2. Contact Data includes billing address, delivery address, email address & telephone numbers.
3. Client Data includes information you provide us which is relevant to the service we provide to you.
4. Transaction Data includes details about payments to and from you and other details of services you have purchased from us.
5. 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.
6. Usage Data includes information about how you use our website and services.
7. Marketing and Communications Data includes your preferences in receiving marketing & your communication preferences.
8. 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 you consent that that your personal data may be used by us to consider you for a position with the company. You also agree that we may use the details you provided to contact you.
9. Recruitment data - we may record details about positions for which you have been applied, interviews attended and interview feedback.

How is your Data Collected?

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

1. 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.
2. 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. Our Cookie policy is available on www.datascan.ie
3. Third parties or publicly available sources. We may receive personal data about you from 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, 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.

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

1. **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service and the best experience. We do not use your personal data for activities where our interests are over ridden 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 DataPrivacy@Datascan.ie
2. **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.
3. **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.
4. **Consent** - we will only process your data when you have consented to it for one or more specific purpose. You can easily withdraw your consent and processing of your data will cease if you withdraw it.

Datascan Privacy Policy

Purpose/Activity	Type of data	Lawful basis for processing
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 Recruitment 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	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 services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system support, reporting, hosting)	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (running our business, provision of admin and IT services, network security, to prevent fraud and in the context of a business re-organisation) 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 (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, 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)

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 DataPrivacy@Datascan.ie

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 communication at any time by emailing us at DataPrivacy@Datascan.ie at any time with the subject **Unsubscribe or GDPR Opt-out**.

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

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.

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 admin services.
- ii. Professional advisers acting as processors or joint controllers including legal advisors, bankers, auditors and insurers.
- iii. Revenue, governmental agencies, regulators, grant authorities and other authorities acting as processors or joint controllers based in Ireland to whom we are obliged to share information about our organisation and participation in it.

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.

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 all parties are subject to confidentiality agreements.

Datascan Document Services and Datascan Redaction Services have achieved ISO27001:2013 standard for information security and we have procedures in place to deal with personal data breaches which include an obligation on us to notify the Data Protection Commission where necessary.

Retention of 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, Revenue accounting, or reporting requirements.

In some circumstances we may anonymize your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your Rights Under the GDPR

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 processing it in accordance with the GDPR.

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 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** DataPrivacy@Datascan.ie