



# RAW MARKETING DATA PROTECTION POLICY

## Introduction

We take your privacy very seriously and have updated our Privacy Statement in line with the upcoming GDPR regulation. We're absolutely committed to reflecting the high standards set by GDPR and processing your data in an open and transparent manner.

The purpose of this document is to provide a concise policy statement regarding the Data Protection obligations of RAW Marketing & Events LTD (RAW Marketing). This includes obligations in dealing with personal data, in order to ensure that the organisation complies with the requirements of the relevant Irish legislation, namely the Irish Data Protection Act (1988), the Irish Data Protection (Amendment) Act (2003) and The General Data Protection Regulation (2018).

We take your personal data very seriously. Please find below our updated policy.

## Rationale

RAW Marketing must comply with the Data Protection principles set out in the relevant legislation. This Policy applies to all Personal Data collected, processed and stored by RAW Marketing in relation to its staff, service providers, clients and other parties encountered in the course of its activities. RAW Marketing makes no distinction between the rights of Data Subjects who are employees, and those who are not. All are treated equally under this Policy.

## Scope

The policy covers both personal and sensitive personal data held in relation to data subjects by RAW Marketing. 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 RAW Marketing. Both categories will be equally referred-to as Personal Data in this policy, unless specifically stated otherwise.

This policy should be read in conjunction with the associated Subject Access Request procedure, the Data Retention and Destruction Policy, the Data Retention Periods List and the Data Loss Notification procedure.

## RAW Marketing as a Data Controller

In the course of its daily organisational activities, RAW Marketing acquires, processes and stores personal data in relation to:

- Current Employees of RAW Marketing
- Previous Employees of RAW Marketing
- Customers of RAW Marketing
- Previous Customers of RAW Marketing
- Third party service providers engaged by RAW Marketing
- Food & Craft Traders engaged by RAW Marketing under the brand Artisan Events.
- Previous Food & Craft Traders engaged by RAW Marketing under the brand Artisan Events.

In accordance with the Irish Data Protection legislation, this data must be acquired and managed fairly.

Due to the nature of the services provided by RAW Marketing, there is regular and active exchange of personal data between RAW Marketing and its Data Subjects. In addition, RAW Marketing exchanges personal data with Data Processors on the Data Subjects' behalf.

This is consistent with RAW Marketing's obligations under the terms of its contract with its Data Processors.

This policy provides the guidelines for this exchange of information, as well as the procedure to follow in the event that a RAW Marketing staff member is unsure whether such data can be disclosed.

In general terms, the staff member should consult with the Data Protection Officer to seek clarification.

## Third-Party Processors

In the course of its role as Data Controller, RAW Marketing engages a number of 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.

These Data Processors include:

- Health Service Executives ([www.HSE.ie](http://www.HSE.ie))
- Revenue Commissioners ([www.revenue.ie](http://www.revenue.ie))
- Niall Byrne & Co (Certified Accountants) ([www.niallbyrneco.ie](http://www.niallbyrneco.ie))

## The Data Protection Principles

The following key principles are enshrined in the Irish legislation and are fundamental to the RAW Marketing's Data Protection policy.

In its capacity as Data Controller, RAW Marketing ensures that all data shall:

1. Personal data is to be obtained and processed fairly and lawfully.

For data to be obtained fairly, the data subject will, at the time the data are being collected, be made aware of:

- The identity of the Data Controller (RAW Marketing)
- The purpose(s) for which the data is being collected
- The person(s) to whom the data may be disclosed by the Data Controller
- Any other information that is necessary so that the processing may be fair.

RAW Marketing will meet this obligation in the following way.

- Where possible, the informed consent of the Data Subject will be sought before their data is processed;
- Where it is not possible to seek consent, RAW Marketing will ensure that collection of the data is justified under one of the other lawful processing conditions - legal obligation, contractual necessity, etc.;
- Where RAW Marketing intends to record activity on CCTV or video, a Fair Processing Notice will be posted in full view;
- Processing of the personal data will be carried out only as part of [The Company]'s lawful activities, and RAW Marketing will safeguard the rights and freedoms of the Data Subject;
- The Data Subject's data will not be disclosed to a third party other than to a party contracted to RAW Marketing and operating on its behalf.

2. Personal data is to be obtained only for one or more specified, legitimate purposes.

RAW Marketing will obtain data for purposes which are specific, lawful and clearly stated. The individual will have the right to question the purpose(s) for which RAW Marketing holds their data, and RAW Marketing will be able to clearly state that purpose or purposes.

3. Personal data is not to be further processed in a manner incompatible with the specified purpose(s).

Any use of the data by RAW Marketing will be compatible with the purposes for which the data was acquired.

4. Your personal data will be kept safe and secure.

RAW Marketing will employ high standards of security in order to protect the personal data under its care. Appropriate security measures will be taken to protect against

unauthorised access to, or alteration, destruction or disclosure of any personal data held by RAW Marketing in its capacity as Data Controller.

Access to and management of staff and customer records is limited to those staff members who have appropriate authorisation and password access.

5. Your personal data will be kept accurate, complete and up-to-date where necessary.

RAW Marketing will:

- ensure that administrative and IT validation processes are in place to conduct regular assessments of data accuracy;
- conduct periodic reviews and audits to ensure that relevant data is kept accurate and up-to-date. RAW Marketing conducts a review of sample data every six months to ensure accuracy; Staff contact details and details on next-of-kin are reviewed and updated every two years.
- conduct regular assessments in order to establish the need to keep certain Personal Data.

6. Your personal data will consistently be adequate, relevant and not excessive in relation to the purpose(s) for which the data were collected and processed.

RAW Marketing will ensure that the data it processes in relation to Data Subjects are relevant to the purposes for which those data are collected. Data which are not relevant to such processing will not be acquired or maintained.

7. Your personal data not be kept for longer than is necessary to satisfy the specified purpose(s).

RAW Marketing has identified an extensive matrix of data categories, with reference to the appropriate data retention period for each category. The matrix applies to data in both a manual and automated format.

Once the respective retention period has elapsed, RAW Marketing undertakes to destroy, erase or otherwise put this data beyond use.

8. Your personal data will be managed and stored in such a manner that, in the event a Data Subject submits a valid Subject Access Request seeking a copy of their Personal Data, this data can be readily retrieved and provided to them.

RAW Marketing has implemented a Subject Access Request procedure by which to manage such requests in an efficient and timely manner, within the timelines stipulated in the legislation.

## Definitions

For the avoidance of doubt, and for consistency in terminology, the following definitions will apply within this Policy.

### Data

This includes any data supplied.

Automated data means data held on computer or stored with the intention that it is processed on computer.

Manual data means data that is processed as part of a relevant filing system, or which is stored with the intention that it forms part of a relevant filing system.

### Personal Data

Information which relates to your individual information, who can be identified either directly from that data, or indirectly in conjunction with other data which is likely to come into the legitimate possession of the Data Controller. (If in doubt, [The Company] refers to the definition issued by the Article 29 Working Party and updated from time to time.)

### Sensitive Personal Data

A particular category of Personal data, relating to: Racial or Ethnic Origin, Political Opinions, Religious, Ideological or Philosophical beliefs, Trade Union membership, Information relating to mental or physical health, information in relation to one's Sexual Orientation, information in relation to commission of a crime, banking information, personal public service number and information relating to conviction for a criminal offence

### Data Controller

A person or entity who, either alone or with others, controls the content and use of Personal Data by determining the purposes and means by which that Personal Data is processed.

### Data Subject

A living individual who is the subject of the Personal Data, i.e. to whom the data relates either directly or indirectly.

### Data Processor

A person or entity who processes Personal Data on behalf of a Data Controller on the basis of a formal, written contract, but who is not an employee of the Data Controller, processing such Data in the course of his/her employment.

### Data Protection Officer

A person appointed by [The Company] to monitor compliance with the appropriate Data Protection legislation, to deal with Subject Access Requests, and to respond to Data Protection queries from staff members and service recipients

## Subject Access Requests

Any formal, written request by a Data Subject for a copy of their personal data (a Subject Access Request) will be referred, as soon as possible, to the Data Protection Officer, and will be processed as soon as possible; within not more than 40 days from receipt of the request.

It is intended that by complying with these guidelines, RAW Marketing will adhere to best practice regarding the applicable Data Protection legislation.

For more information on your personal data that we have access to, please send your written query to;

Raw Marketing & Events Ltd.  
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Ranelagh  
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