



IMQCS PRIVACY NOTICE

1. What personal data do we collect?

To discharge its functions and provide a service to its members, registered technicians, the Irish Milk Quality Co-operative Society Limited (“**IMQCS**”) collects certain types of information on individuals. To the extent that this information identifies, or is capable of identifying, an individual it constitutes “personal data”. Please take note of the following categories of personal data which IMQCS may, from time to time, have cause to collect:

- 1.1 name, occupation, job title;
- 1.2 contact details including home address, business address, telephone number, email address;
- 1.3 financial details such as bank account numbers and reference numbers;
- 1.4 age, employment status, educational awards and training qualifications (for instance to appropriately determine eligibility for the purposes of ICOS Skillnet training courses);
- 1.5 government issued identification (e.g. passports), other identification instruments and utility bills (for instance of selected committee members for anti-money laundering);
- 1.6 records of invitations and briefings sent to you and of your attendance at IMQCS events, including photographs taken of you at these events;

2. What is the purpose for processing this data and on what legal bases?

Your personal data is used by us and by third party service providers acting on our behalf for the following purposes:

- 2.1 maintaining our list of contacts and Technician Register;
- 2.2 providing advice and services to our members, and technicians relating to the Irish dairy sector;
- 2.3 for administrative and billing purposes and for other purposes incidental to the services IMQCS provides;

- 2.4 to ensure that content from our websites is presented in the most effective manner for you;
- 2.5 sending you invitations to events, meetings and training courses;
- 2.6 to notify you about changes to our service.

The legal bases on which we collect, process and transfer your information in the manner described above are:

- where any such processing is necessary for the performance of a contract with us; and
- our legitimate interests in conducting our business in a responsible and commercially prudent manner.
- Where it is in your vital interest. For example, allowing you to conduct business as a registered milking machine technician.
- Our legitimate interest in maintaining a business relationship and communicating with you, as a business contact, about our events and providing you with information about new developments in IMQCS.

3. What are the sources for this data?

We collect information we have received from you either:

- as part of an application to take part in one of our training courses and/or Technicians Register; or
- as part of the documents we request for participation on the committee of management of IMQCS.

4. When do we share your data?

We may share your personal data with selected third-party recipients where there is a legitimate and relevant justification for doing so.

As you may be aware, milking machine technicians' personal data such as name, address and phone number are shared with the general public via the Technicians Register on the [IMQCS website](#).

To further the interests of our members and registered technicians, IMQCS maintains business relationships with third party organisations such as our auditors and information technology service providers and couriers. In order to ensure to serve our members and registered technicians interests we may, where appropriate, share your personal data with these third parties. When we do so we will make enquiries regarding the privacy protections in place within such organisations.

We may also disclose your personal data where compelled to do so by a court of law, to co-operate with law enforcement agencies or where acting in good faith we form the view

that to so disclose would expose our organisations, and by extension, its members to liability.

We may occasionally transfer personal data outside the EEA but will not do so without your permission nor without appropriate assurances on the adequacy of data privacy protection commitments.

5. How long do we retain personal data?

We will retain your personal data for as long as it is reasonably necessary for us to provide you with our services and to comply with relevant regulatory and legal obligations. If you are a business contact, we will retain your personal data for as long as we consider you to be a business contact and we will give you the opportunity to unsubscribe if you no longer wish to receive communications from us.

6. How is your personal data kept safe and secure?

We employ physical, electronic and managerial measures to ensure that we keep your personal data secure, accurate and up to date.

These measures include technology features such as fire walls, machine encryption and anti-virus software. Managerial practises include access restriction controls ensuring that the processing of personal data is carried out in a manner that minimises risk to the rights of the subject.

Please note that although we employ security measures geared to keep your personal data safe and secure, the transmission of data over the internet, whether via email or a web platform, can never be assumed to be completely secure. While IMQCS endeavours to protect personal data, we cannot guarantee the security of data transmitted to us or by us.

7. What happens if data is recalled by you as data subject?

You are not under a statutory or contractual duty to provide us with any personal data. However, there are some pieces of information that you must provide to us so that we can provide you with our services. We will notify you of any such required information.

If you do not provide us with your information for the purposes described above, we may not be able to include you on the Technicians Register, send you updates, respond to your queries sent or provide you with our services.

8. What rights do you have to your data?

Under the GDPR you have the right to:

- a) be informed about the personal data we hold relating to you;
- b) have access to that personal data;
- c) rectification of inaccurate/incomplete personal data;
- d) erasure;
- e) restrict processing;



- f) data portability;
- g) object to any processing of personal data; and
- h) rights in relation to automated decision making and profiling.

Each of these rights are supported by appropriate procedures within IMQCS that allow the required action be taken within the timescale stated by GDPR

9. How do you make a complaint?

If you are unhappy with how we process personal data, we ask you to contact us on the below contact details so that we can rectify the situation:

Eamonn Farrell, IMQCS Secretary

Email: eamonn.farrell@icos.ie

You may lodge a complaint with a supervisory authority. The Irish supervisory authority is the Data Protection Commission and they may be contacted via the below link:

<https://dataprotection.ie/docs/Raise-a-Concern/1716.htm>