
THESHIREDOTCO PTY LTD – PRIVACY NOTICE

BACKGROUND:

THESHIREDOTCO PTY LTD understands that your privacy is important to you and that you care about how your personal data is used. This privacy notice describes our obligations to our users of our website and their rights as 'Data Subjects' under the relevant data protection legislation.

1. Information About Us

THESHIREDOTCO PTY LTD

We are a limited company registered in Australia under Australian Business Number number 49 613 872 709.

THESHIREDOTCO PTY LTD

1 Sandbar Place,
Port Hacking,
NSW,
AUSTRALIA, 2229

Data Protection Officer: **George Harris**

Email address: george@dataprivacyservices.co.uk

Postal Address: THESHIREDOTCO PTY LTD

1 Sandbar Place,
Port Hacking,
NSW,
AUSTRALIA, 2229

We are regulated by the Information Commissioners Office (ICO).

2. What Does This Notice Cover?

This privacy notice explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as a business email address (e.g. first.lastname@companyX.com), electronic location data, and other online identifiers. Note – this also includes video and images.

An overview of how we may process your personal data is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold unless there are legal exemptions in place:

- a) **The right to be informed** about our or collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) **The right to access** the personal data we hold about you. Part 8 will tell you how to do this.
- c) **The right to have your personal data rectified** if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) **The right to be forgotten**, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 8 to find out more.

Note - we apply legal exemptions to this particular right such as if there is an ongoing requirement to legitimately process your data (such as the handling of an ongoing contractual dispute) or when we may need to retain the data in the future to defend a legal claim.

- e) **The right to restrict** (i.e. prevent) the processing of your personal data.
Note – this right doesn't include the right to prevent THESHIREDOTCO PTY LTD from undertaking its lawful processing of your data relating to contract necessity
- f) **The right to object** to us using your personal data for a particular purpose or purposes. (The note above applies to this right)
- g) **The right to data portability**. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) **Rights relating to automated decision-making and profiling**. Note - We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 8.

Further information about your rights can also be obtained from the **Information Commissioner's Office (ICO)** or your local **Citizens Advice**.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with our **Data Protection Officer** in the first instance.

If you are still unhappy with the processing of your personal data, you may lodge a complaint with the Information Commissioner's Office (ICO) if this is in the UK or your specific information regulator if outside of the UK.

Note – You can view our Data Subject Access Request Policy on the following web site.

<https://www.theshire.co>

5. What Personal Data Do We Process?

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Personal data (required under contract necessity, and used to fulfil contractual obligations aligned with our Terms and Conditions of supply of services;

Details are on our websites:

<https://www.theshire.co>

Personal data typically includes:

- Name
- Address
- Contact details
- Profile information about an employer, recruiter or job seeker
- Images
- Video
- Payment information (for the processing of payment for services – based upon consent, contract necessity and legitimate interest). **Note** – we do not store any credit / debit card information;
- General contact information (for facilitating general communication enquiries with our website users, customers, employees and business partners);
- General information that could be of a personal identifiable nature that has been provided to us by the data subject or authorised parties outside of the interaction with the website e.g. via face to face communication, email, telephone or other means such as social media.

6. How Do We Use Your Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract (either as a Data Controller or Data Processor), because you have consented to our use of your personal data, or because it is in your legitimate interest to use it. Your personal data will be used for one or more of the following purposes:

- Facilitation of a contract of employment with our Employees
- Facilitation of a contract between ourselves and our clients (i.e. Employers and Job Seekers)
- Facilitation of a contract between ourselves and our Suppliers
- Providing and managing an Employer, Recruiter and Job Seeker account on our systems
- Administration of clients information as and when required
- Processing financial information in relation to our client's sales order processing
- Processing information through our organisation's website
<https://www.theshire.co>

- Supplying our services to you. Personal details are required for us to:
 - Enable us to manage the administration of the supply of services on behalf of our clients
 - Enable us to manage the administration of the supply of services in conjunction with our Suppliers and sub-contracted third parties
- Communicating with you. This may include responding to letters, emails, text messages, live chat or calls from you
- Contacting you to inform you of updates to our range of services including marketing campaigns (you will have the option to 'opt out' based upon an implied consent to receive marketing communications)

Note – We only use your personal data for its intended purpose unless required to divulge information to the necessary authorities for the prevention and or detection of crime.

7. **Sharing Personal Data**

Note - We do not sell, trade, or rent personal identifiable information to others.

There is often a requirement to share your personal data to facilitate the contract between us. Therefore, we may share your personal data with:

- a. Our Suppliers for services we provide to you (e.g. our web hosting and payment card providers)
- b. Our sub-contractors who assist us to deliver the services to you
- c. Our providers of IT equipment, support and maintenance
- d. Our legal partners including solicitors and debt collection agencies
- e. Financial partners including banks and card payment providers

8. **How Can I Access My Personal Data?**

If you want to know what personal data we hold about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “**subject access request**”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 8. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, however all information contained therein is required therefore it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

Note – you will be asked to provide a **formal proof of identity and residency** to ensure that you are legitimately requesting access to information. Failure to provide this proof will result in a refusal to process the request beyond that point.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within **one month** of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

We have a specific Data Subject Access Request Policy, this can be found on our websites at the following links:

<https://www.theshire.co>

9. **Storage of Personal Data**

We store your personal data in accordance with the principles of GDPR under Article 5. This means that:

- We only store the data for its intended legitimate purpose
- The storage and processing of your data is not excessive
- We store the data for a period that is considered legitimate and is aligned to our organisations data retention policy
- We ensure that your personal data is safe within the boundaries of our control as a Data Controller and monitor the security of any data that is shared with third parties (our Data Processors)

Your personal data is stored within the European Union (EU) in the vast majority cases. Where this isn't the case, we ensure that adequate provision is made for the protection of data (e.g. when data is processed in the United States of America under 'Privacy Shield').

Personal data is typically stored in the following ways:

- In digital format in our offices – this data is held on our digital systems and secured in line with our overall IT Security Policy
- In digital format by our third parties – this could be either in remote data centres or on their specific digital systems, secured in line with our IT Security Policy

10. **Company Website**

The processing of customer personal data through our website is covered specifically within this document and our Website Privacy Policy.

11. **How Do You Contact Us?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of **George Harris**

Email address: george@dataprivacyservices.co.uk

Postal Address: THESHIREDOTCO PTY LTD
1 Sandbar Place,
Port Hacking,
NSW,
AUSTRALIA, 2229

Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available via our web site.

<https://www.theshire.co>