


Phoenix STS Policies, Procedures and Forms					
Title	Privacy Policy			Author	Paddy McDonnell
Category	Internal Policy	Reference	IP-09	Revision No.	1.0
Effective Date	08.03.2024	Revision Date	March 2026	Page	1 of 1
Authorised by	Paddy McDonnell	Signature		Position	CEO

Introduction: This policy outlines Phoenix STS's approach to data protection and privacy, emphasising the collection, use, storage, and sharing of personal data.

Principles: To safeguard the integrity and privacy of the data collected.

- That consent is sought, and an explanation is given for the purposes for which the information is collected.
- information should only be used for the purposes for which it was collected.
- That information is not held for longer that it is required.
- That access to information is provided on a needs only basis.
- To report breaches of security of the data should it occur.
- To fully comply with current legislation.

Implementation:

- **Data Collection and Consent:** - That there is an emphasis on consent for data collection and processing, and data minimisation when collecting personal information.
- **Data Storage and Security:** - Data is stored on servers in the EU and Ireland, with security measures against digital threats. This is consistent with using encrypted digital storage solutions and strict access controls to ensure data security.
- **Use of Data:** - The purposes for using data (e.g., responding to enquiries, processing orders) where data is collected for specific, legitimate purposes.
- **Sharing Personal Data:** - Data sharing with third parties for order fulfilment, legal requirement and certification must align with guidelines on sharing data with third parties under strict conditions to ensure privacy.
- **Data Retention:** - Personal data is retained as long as necessary for the purposes collected, with specific retention periods mentioned for orders and warranties. This approach is compatible with the IP-09 Data Protection Policy, which specifies retention periods for different data types to comply with legal requirements.
- **Rights of Individuals:** Individuals' rights regarding their data, including access, correction, and withdrawal of consent must be fully respected. These rights are essential for compliance with data protection laws and the GDPR.
- **Data Protection Measures and Compliance:** - Measures to protect personal data, compliance with legal obligations, and procedures for data breach response are vital to compliance.
- **International Data Transfers:** - The policy mentions transferring data outside the EEA, requiring protections comparable to those within the EEA. This consideration is crucial, similar to the IP-09 Data Protection Policy's emphasis on ensuring data protection compliance when transferring data internationally.
- **Rights of Individuals:** The policy outlines individuals' rights regarding their data, including access, correction, and withdrawal of consent. These rights are essential to the IP-09 Data Protection Policy, which emphasises compliance with data protection laws and the GDPR.

Responsibility:

- **Staff Compliance:** All staff must understand and adhere to this policy.
- **Designated Officer:** The Officer manager has particular responsibility for data management including privacy policy.

Communication: This policy will be communicated to all employees and relevant parties within Phoenix STS Ltd.

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