



Privacy and Cookie Policy

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DOCUMENT CONTROL

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REVISION HISTORY

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V1.0	29 th May 2018	Initial Document	GM	No

Introduction and Scope

Any references in this policy to “we”, “us”, “our”, “Tech Guard”, and/or the “Company” hereafter refers to Tech Guard and Tech Guard is a trading name of PC Tech Support, a private limited company incorporated in Ireland with a registered number of 556003 and a registered office address of Moher East, Mountrath, Co. Laois, Ireland.

Tech Guard is a Managed IT Security Services provider that provides a range of Managed IT Security related services from Security Awareness Training, GDPR awareness training, simulated phishing services, managed next generation firewall services, managed backup and disaster recovery services and managed operational cyber security services along with other IT Security services. We are also a reseller of several IT Security related onsite and cloud-based security software.

We collect and process personal data in order to provide these above services. This privacy and cookie policy describes the types of information we collect and use, who that information relates to, how and why we use such information, who we share it with and your legal rights.

When we talk about information in this policy, we mean any information relating to you, either directly or indirectly.

Unless indicated otherwise, this policy applies to our website, domains, and to our provision of IT Support and IT Security services (referred to as “**our Services**”).

The content of this article does not constitute legal advice and should not be relied upon as such. Consult your legal advisor to understand your rights and obligations to comply with any laws and/or regulations.

Who this policy applies to

We collect and process information which relates to a variety of categories of individuals. These include individuals who may not have a direct relationship with Tech Guard. We have described below the main types of individuals whose information we collect, use and otherwise process:

- **Clients and related individuals:** We collect and use information relating to our prospective, current and former clients. We may also collect and use information relating to individuals connected with our clients, such as their employees, partners, directors, company secretaries and/or board members.
- **Business and marketing contacts:** In the course of providing and marketing our Services, we may also collect and use information relating to visitors to our websites and domains, visitors to our offices, event invitees, attendees, visitors to our trade show stands, blog/newsletter followers or other email recipients, and other business and marketing contacts.
- **Suppliers:** In the course of our day to day running of our business operations we deal with various suppliers of goods and services both locally and internationally.
- **Job Applicants:** Should job applicants reach out to use via the website or email, we may also be recipients of their personal data.

Contact Details

Our privacy officer may be contacted at privacy@techguard.ie or via phone on + 353 1 699 1545 or via physical mail addressed to Privacy Officer, Tech Guard, Moher East, Mountrath, Co. Laois.

What personal information do we collect from you?

You may give us personal data by:

- Becoming a client of or a supplier to Tech Guard. Clients and suppliers supply us with information. The type of information we may collect and process for this purpose is:
 - o Name
 - o Employee/job title/position
 - o Contact details including address, phone number and email address
 - o Financial information e.g. bank details, billing details, VAT number
 - o Any information provided to us on your behalf.
- Communicating with us by phone, e-mail or otherwise. We ask you to disclose only as much information as is necessary to provide you with our services or to submit a question/suggestion/comment in relation to our website or our services.
- Filling in forms on www.techguard.ie (our website) e.g. the contact us form.
- Applying to work with us. The type of information you may provide in your CV, a cover letter, your name, address, e-mail address and phone number. CVs should include information relevant to your employment history and education (degrees obtained, places worked, positions held, relevant awards, and so forth). We ask that you do not disclose sensitive personal data (e.g. gender, height, weight, medical information, religion, philosophical or political beliefs, financial data) in your application.
- Requesting information regarding your personal data we hold on our systems. Before we can release such information we typically will request proof of your identity (e.g. passport, driving license, utility bill) to confirm such.

What information about you do we obtain from others?

We do not usually collect personal data from third party sources. However, we may connect with clients and contacts via social media networks, e.g. LinkedIn. In those circumstances we may have access to your publicly available details from that source. We do not download that data or integrate it with our systems. Our clients, suppliers or partnering IT companies might refer you to us and as such may pass your personal information (name and contact details) to us.

Why do we collect this information?

We collect the information set out above in order to provide you with our services, to market our services, to improve our website and to recruit staff.

We use this information as follows:

CLIENTS:

- To set you and/or your company up as a Client on our systems;
- To setup your employees on our system - should we require to interact with your employees in line with the Services which we provide. Their name, and contact details may also be stored in our systems;
- To provide products and services to you in accordance with any agreements entered into between us;
- To liaise with you and your employees about services we are providing you with;
- To liaise with you and your employees about projects that we are undertaking with you;
- To ensure payment of our invoices;

- To advise you of updates to our products and services and new developments in IT Security and data protection areas generally, as part of an agreement between us, or where you have specifically consented and asked for us to do so.
- in accordance with the legitimate interests of the Company to generate as many sales as possible and to promote our organisation we may send you information by e-mail from time to time or contact you by telephone about our products and services that might be of interest or use to you and/or your company, security updates, white papers and events. You will always be provided with the opportunity to opt- out of receiving these communications;
- in an anonymised format for research, statistical analysis and behavioural analysis; and for diagnosing problems with the website and fraud prevention and detection.

JOB APPLICANTS:

- To create a candidate profile for you if you are a prospective employee.
- To prepare interview notes.

WEBSITE USERS:

- To liaise with you in relation to requests for information on our services submitted through our website
- To liaise with you in relation to provision of security alerts that you may have signed up with via our website.
- To make suggestions and recommendations to you and other users of our website about services that may interest you or them.
- In accordance with the legitimate interests of the Company to generate as many sales as possible and to promote our organisation we may send you information by e-mail from time to time about our products and services that might be of interest to you, security updates, white papers and events. You will always be provided with the opportunity to opt- out of receiving these communications. Should you not be a client of ours in accordance with the GDPR, we will specifically request consent to market to you;
- In an anonymised format for research, statistical analysis and behavioural analysis; and for diagnosing problems with the website and fraud prevention and detection.

Legal Basis for collecting information

The legal basis for the processing of your personal data are:

- Processing necessary for the performance of a contract which you have entered into with us or to take steps at your request prior to entering into a contract.
- Processing necessary for compliance with a legal obligation to which we are subject;
- Processing necessary for the purposes of the legitimate interests which we pursue where such interests are not overridden by your interests or fundamental rights or freedoms;
- That you have provided consent for the processing for one or more specified purposes.

We do not usually collect or process any special category data. Our clients that we support however may process sensitive category data saved in local or cloud-based systems or databases. Our clients may require to collect and process this data to undertake their business operations. Where we act as their IT Support provider or backup provider we may have access to such systems that house sensitive category data e.g. medical data, for the purposes of backing up the data within the system or supporting the IT administration requirements of the system. We have strict procedures and protocols in place to restrict the viewing or intentional capturing of this data and strict data protection agreements in place with our clients that restrict use of these systems for purposes outside our IT Services remit. Where data is backed up (processed) by us on behalf of the client – this data is encrypted with AES 256-bit encryption before being backed up to a secure ISO approved datacentre based solely within the EU ensuring the data is secure from unauthorised users.

How long do we keep hold of your information?

The time periods for which we retain your information depend on the type of information and the purposes for which we use it. We will keep your information for no longer than is required or permitted. For further information on the periods for which your personal data is kept, please contact privacy@techguard.ie

Who do we share this information with?

We do not sell or distribute your personal information to third parties for purposes of allowing them to market products and services to you.

We may share your personal data with our employees and/or consultants who may work on your account, selected business associates; suppliers and contractors to provide you with our services. For example, these business partners may include our IT Cloud service providers.

In addition, we may disclose your personal information to third parties:

- In line with the IT Security services we provide as part of our agreement with you. For instance, we may communicate (on your behalf) with other outsourced providers of yours and may need to share some personal data e.g. name and contact details, while troubleshooting an issue to resolution.
- If we or substantially all of our assets are acquired by a third party, in which case information held by us about our Clients will be one of the transferred assets;
- In line with the provision of the services to you – we may from time to time use sub-contractors to assist us in the provision of IT Services to you. Where this may be the case these contractors will have entered agreements with us to ensure that they only use your data for the purpose of our agreement with them and on our instructions.
- If we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect our rights, property, or safety, our Clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- If you place orders with us or are responsible in your organisation for arranging payment to us for products and services provided to your organisation we may store your personal information in our accounting system Sage.
- If we undertake offsite backups for you of your systems – your personal data will be encrypted and held in solely in our backup providers ISO approved datacentre in Europe and will not leave the EU.
- To provide our IT Security services to you, we may use a number of outsourced cloud-based IT security software platforms and systems such as AntiVirus or Simulated Phishing providers. These cloud-based providers store their data solely within ISO approved datacentres inside the EU at present. Certain bits of personal data e.g. your IP address or email address may be shared with these providers to facilitate the provision of these type of IT Security Services to you.
- On occasion we may use cloud-based marketing platforms for sending digital forms and direct marketing emails and managing mailing lists. These systems may store personal data in the United States for the purpose of providing us with this service. We have strict procedures in place to ensure that if the use of such companies is undertaken that they have self-certified that they adhere to the EU-US Privacy Shield framework. We ensure that an agreement is in place between us and such providers to ensure that they only use your data for the purpose of our agreement with them and on our instructions.

The following is a list of third parties with whom a limited amount of your personal data may be possibly shared with depending on the services we provide to you:

- Tech Guard Employees and Consultants.
- Email, Backup & Cloud services/platforms
- Payroll service provider
- Accounting: software service providers, our Accountant and our Auditor
- Insurance Services (our Broker and Insurance Company)

- Revenue Commissioners and other Regulatory Bodies (where required to do so)
- Bank

Security of your data

Where we use outsourced cloud-based IT security software platforms and systems such as Backup, AntiVirus or Simulated Phishing providers – we have strict data processing agreements in place with each provider to ensure adequate technical and organisational measures (TOMS) have been put in place to best safeguard your personal data.

Any personal information which Tech Guard collects about you will be treated with the highest standards of security and confidentiality, strictly in accordance with the Data Protection Acts, 1988 & 2003 and the General Data Protection Regulation (GDPR) that came into force on 25th May 2018. As an IT security provider, we take our responsibilities to protect your personal data very seriously and employ the most appropriate physical measures including staff training and awareness and we review these measures regularly. Tech Guard is currently Cyber Essential Certified and our certification can be downloaded from our website footer via the link in the footer of our website.

What are your rights with respect to your personal data?

You have a number of rights which you may exercise in respect of your personal data. If you wish to exercise any of these rights, please email privacy@techguard.ie detailing the right that you wish to exercise together with official documentation confirming your identity such as passport, driving licence. We must respond to you without delay and in any event within one month (subject to limited extensions). You are entitled to lodge a complaint with the Data Protection Commissioner if you are not happy with our response when you chose to exercise any of your rights below. The following are a synopsis of your data protection rights. We are allowed to refuse your request in certain limited circumstances. If this arises we will let you know.

You have the following rights:

- **Right to your information** – You have the right to certain information in relation to the personal data we hold about you.
- **Right of access** - You have the right to receive information from us in relation to the personal data that we hold about you.
- **Right to rectification** – The right to require us to rectify any inaccurate personal data about you without undue delay.
- **Right of erasure/right to be forgotten** – The right to have us erase any personal data we hold about you in circumstances such as where it is no longer necessary for us to hold the personal data or, in some circumstances, if you have withdrawn your consent to the processing.
- **Right to object** – You have the right to object to us processing personal data but only where we are processing the personal data on the grounds of legitimate interest.
- **Right to data portability** – You have the right to ask us to provide your personal data to you in a portable format or, where technically feasible, for us to port that personal data to another provider provided it does not result in a disclosure of personal data relating to other people.
- **Right to object to automated decision making including profiling** – This is a right not to be the subject of automated decision-making by us using your personal information or profiling of you.
- **Right to withdraw consent** where we are processing your personal data on the grounds of consent you have a right to withdraw your consent to the processing.

Do we transfer your information Outside The European Union or European Economic Area?

In some circumstances, it may be necessary for us to transfer your Personal Data to a country outside the European Economic Area (“EEA”). We will only transfer your Personal Data where the transferee is based in a country that has been approved by the EU Commission, or where there are appropriate safeguards in place to protect your Personal Data.

Cookie Policy

Cookies are small pieces of information, stored in simple text files, placed on your computer or internet enabled device by a web site. Typically, it is used to ease navigation through the Website. Cookies can be read by the web site on your subsequent visits. In addition, the information stored in a cookie may relate to your browsing habits on the web page, or a unique identification number so that the web site can remember you on your return visit.

By using our website you are agreeing to our use of cookies.

We may use cookies for the following purposes:

Google Analytics and Tags – We use cookies to learn how you, and other users, use our services and how well they perform. This allows us to identify errors, learn how our services perform, and improve and develop our services over time. We use Google Analytics and Google Tags: This is a web analytics service provided by Google Inc. which uses cookies to show us how visitors found and explored our site, and how we can enhance their experience. It provides us with information about the behaviour of our visitors (e.g. how long they stayed on the site, the average number of pages viewed) and also tells us how many visitors we have had. The aggregated statistical data cover items such as total visits or page views, and referrers to our website. For further details on Google’s privacy policies see www.google.com/analytics/learn/privacy.html .

Functionality – These cookies remember choices you made to improve your experience on our website.

Wordpress – the Website is hosted on Wordpress. Please see link to their cookie policy attached - <https://en.support.wordpress.com/cookies/> .

Youtube – the videos on our website are hosted through Youtube. Please see attached link to the Youtube privacy policy - https://www.youtube.com/static?template=privacy_guidelines .

Website Optimisation – We use cookies to improve the operation and presentation of our website. Our website is built using common internet platforms. These have built-in cookies which help compatibility issues (e.g., to identify your browser type) and improve performance (e.g., quicker loading of content).

Marketing – We may use tags from a cloud-based marketing system to track and improve the effectiveness of our marketing emails. For example, we may use such technologies to identify if you read a marketing email or update we sent to you. Where we actively engage the use of such systems in our communication with you - they may store a cookie on our machine to facilitate the above use.

Cookie: Cookie Pop Up

Purpose: We use a cookie to determine if you have read our cookies consent pop up and to ensure we do not show it to you again when you dismiss it.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Governing Law and Jurisdiction

This Policy and all issues regarding our website are governed by the laws of Ireland and are subject to the exclusive jurisdiction of the courts of Ireland.

Enquiries to us and your Right of Complaint to the Data Protection Supervisory Authority

If you are not satisfied with our treatment of your personal data, or if you require further information about our use of your personal data, please contact us. You can contact us by telephone on +353 (0)1 699 1545 or alternatively you can direct your correspondence to our privacy officers email address privacy@techguard.ie or via post to this address: Privacy Officer, PC Tech Support Limited T/A Tech Guard, Moher East, Mountrath, Co. Laois

You also have the right to lodge a complaint with the Data Protection Supervisory Authority (DPSA). The relevant DPSA contact details are:

Data Protection Commission, Canal House, Station Road, Portarlinton, Co Laois | Email: info@dataprotection.ie | Telephone: 1890 252 231

What will happen if we change our Privacy and Cookie Policy?

This statement may change from time to time, and any changes will be posted on our website and will be effective when posted. Please review this statement each time you use our website or our services. This statement was last updated on 29th May 2018.

End of Document