

SmartLink
Privacy Notice
1st May 2021

1. Introduction

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject)

Ei Electronics with a registered address at Ei Campus, Shannon, Co Clare is the controller of your Personal Data. The purpose of this privacy notice is to inform you of the Personal Data relating to you that we collect and the uses we make of such data.

If you have any questions about the use of your personal data, please contact us at Privacy@eielectronics.ie

2. Sites covered by this Privacy Notice

This Privacy Notice applies to the SmartLink Portal only

3. Purposes for Processing

We collect and process personal data relating to you for the following purposes:

- To track the installation and maintenance of Alarms within our properties
- To have contact details of Wardens responsible for the accommodation where Alarms have been installed available within the SmartLink system
- Make contact details of administrators available within SmartLink system

4. Personal Data We Collect and Process

Purpose for Processing	Category of Information Processed
Add Council or Housing association administrators, to allow them to administer the portal for their installations and their Alarm installers	<ul style="list-style-type: none">• First Name• Last Name• Telephone number• Email address
Registration of installer, in order to allocate work orders for installation, know who to contact if there is any issue with the installation, or the installation requires service	<ul style="list-style-type: none">• First Name• Last Name• Telephone number• Email address
Wardens or service staff for installation fault alert notifications if applicable	<ul style="list-style-type: none">• Contact names• Telephone numbers• Email address

5. Requirement to Provide Personal Data

You are not under a statutory or contractual obligation to provide us with any personal data.

If an administrator does not provide the requested data, it will not be possible for that person to access and manage their installations.

If an installer does not wish to provide his/her contact details, it will not be possible to contact him if there is an issue with the installation, or maintenance due

Wardens/ contacts are required to provide contact details in order that the system can alert them in the event of an alarm or fault event if applicable.

6. Legal Basis for processing your personal data

Ei Electronics processes personal data provided by you on one of the following grounds:

Processing Activity	Legal Basis Relied On
Manage the installation and maintenance of Smoke, CO detectors and ancillary items	Contractual obligation, required to maintain contact details for installation and maintenance of alarms and accessories

7. Who Ei Electronics shares your information with

We may disclose your personal data to other organisations in connection with the above purposes including:

- Ei Electronics who own and manage the SmartLink portal
- AWS who manage the underlying infrastructure hosting the application
- To third parties who engage to provide services to us, such as outsourced service providers, IT service providers, professional advisers and auditors;
- To public authorities and bodies where required or permitted by law, such as the Gardaí or other law enforcement authorities for the purposes of the prevention, investigation or detection of crime, Tax authorities etc.

Ei Electronics will not use your information for direct marketing, sell, rent or lease your personal information to others.

8. Cross-border data transfers

We may, from time to time, make use of services provided by 3rd parties for the delivery of our services which may necessitate the transfer of personal data outside the EU/EEA.

If and to the extent that we do so, we will ensure that appropriate measures are in place to comply with our obligations under applicable law governing such transfers. In general, where data needs to be transferred or processed outside the EU/EEA, we chose providers who process data on the basis of:

- EU/US Privacy Shield
- Model Contract Clauses
- An Adequacy Decision from the European Commission

In exceptional circumstances we will rely on the consent of the data subject or the necessity of the processing for the performance of or conclusion/performance of a contract that the Data Subject has entered into.

On a case by case basis, we may rely on other grounds for transfer, including processing that is necessary for the establishment, exercise, or defence of legal claims.

If you would like to receive further details of the measures that we have taken in this regard, please contact us at Privacy@eielectronics.ie

9. Personal Data Retention

We will not hold your personal data for longer than is necessary. We retain your personal data for as long as we need it for the purposes described in this Privacy Notice, or to comply with our obligations under applicable law and, if relevant, to deal with any claim or dispute that might arise between you and us.

The basis for our retention periods is based on:

- Statutory obligations
- Contractual obligations
- Best practices

10. Your Rights

You have the following rights, in certain circumstances and subject to certain restrictions, in relation to your personal data:

- You have the right to withdraw your consent at any time for processing activities for which we rely on consent as a basis for processing your data.
- For processing activities, which are based on a statutory or contractual requirement, you may request your data not be processed for that purpose. However, this is not an absolute right and may be overridden by our statutory obligations. In other cases, requesting that data should not be processed for a particular purpose may prevent us from executing a contract or delivering a service to you.
- You have the right to request
 - **Right of access** – you have the right to request a copy of the information that we hold about you.
 - **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
 - **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
 - **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing.
 - **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
 - **Right to object** – you have the right to object to certain types of processing such as direct marketing.
 - **Right to object to automated processing, including profiling** – you also have the right not to be subject to the legal effects of automated processing or profiling.

If you wish to exercise any of the rights set out above, or have comments or questions about our Privacy Notice, please contact us at: E-mail: Privacy@eielectronics.ie

11. To access what personal data is held, identification will be required

Ei Electronics will accept the following forms of ID when information on your personal data is requested: a copy of your national ID card, driving license, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If the Company is dissatisfied with the quality, further information may be sought before personal data can be released.

12. Keeping your information secure

is committed to protecting the information you provide. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of the information, Ei Electronics has in place appropriate physical and managerial procedures to safeguard the information we collect.

The SmartLink application does not store personal data outside the EEA.

13. Changes to this Notice

We may occasionally update this Privacy Notice. We encourage you to periodically review this policy for the latest information on our privacy practices. The Privacy Notice will specify the latest date on which the terms have been amended.

14. Complaints

If you are not happy with the way, we are using your personal data or how we facilitate your rights or comply with our obligations under applicable data protection law, you have the right to make a complaint to [the Data Protection Commission by emailing info@dataprotection.ie.]