



PRIVACY POLICY & GDPR COMPLIANCE

'A data subject is any person who is the subject of data and whereby personal information is held about them.'

Our Responsibilities

Efitz Marketing must ensure that data subjects are aware of the option to review any data held about them in advance of any personal data being collected or processed.

All Efitz Marketing employees are responsible who ensuring that the data subjects privacy is maintained, and consent is acquired in accordance to GDPR legislation and data is process and collected in a secure legal way.

We have a dual role:

We act as data controllers of information received.

We act as data processors providing marketing services to our clients.

Who are Efitz Marketing?

Efitz Marketing is a full-service marketing agency providing digital, PR and Event solutions to SME's and HPSU's in the South East of Ireland. Our office is based in Tramore, Co. Waterford.

Contact our Data Protection Official at Tramore, Waterford or by email gdpr@efitzmarketing.ie or by phone 051 391350

Personal Data

The personal data we gather from you on our sign-up forms, over the phone, website and in personal meetings help us deliver a great marketing service to you.

We collect information which may be personal or business information, to create/send targeted marketing campaigns to data subjects. We also collect information to send news/blogs to members of the public, students, perspective employees, prospective clients who sign up and who wish to be kept informed.

In some cases, business name/sectors are not necessary to be held (i.e. general public, students etc). We only hold pertinent, relevant information for our business stakeholders. We hold CV's which will be held on file until the data subject request them to be deleted or over five years have passes without hiring that candidate. The following information is collected:



- Email address
- Name
- Phone Number
- Location
- Business Name
- Business Sector

This information provides us with the best point of contact within your business to provide information and notify regarding the latest news from Efitz Marketing, industry news, offers and seasonal updates.

The personal data we collect will be used for the following purposes:

- To provide Efitz Marketing services, PR, and event information, including improvements and personalisation's to the client list
- To promote services and product offerings of Efitz Marketing
- To communicate the latest marketing news and blogs with clients which would be interesting and useful to clients, prospective clients, students, prospective employees and the public.

Consent

Explicit Consent must be received by Efitz Marketing from the data subjects to process personal data. Only relevant data will be acquired for which we will inform the data subject of its purpose and its uses. Consenting to the Efitz Marketing privacy notice means that you are permitting us to process your personal data compatible with the purposes acknowledged.

You may withdraw consent at any time by phone call to 051 391350, email to gdpr@efitzmarketing.ie or by appointment in Tramore, Waterford.

Disclosure of Data

Efitz Marketing will not pass on your personal data to third parties without first obtaining your consent. Data will only be used and disclosed compatible with data collection purposes. Some reputable third-party software businesses are used to facilitate the operations of Efitz Marketing. These are all GDPR compliant.

Retention

Efitz Marketing will process and will store the personal data until the subject data indicates they want it erased, has either left the company, or the company is no longer operating. Data retained will be kept accurate, complete and up to date. When the subject data wishes to opt out, all data will be erased. Data is retained for specific, identified purpose.



Lawful Data Protection

We process personal data within legal guidelines:

- To preform our work as a marketing agency to/for the data subject
- To provide professional services to clients and to keep the subject data informed at Efitz Marketing
- We obtain and process information fairly
- Receiving explicit consent from the data subject
- Which is kept safe and secure
- Which is kept accurate, complete and up-to-date
- Which is adequate, relevant and not excessive
- Which retained for no longer than is necessary
- Providing copies on request to the data subject
- Which is securely protected against loss, damage, destruction, damage to any data retaining objects.
- The data controller is responsible for the accountability folder and demonstrating GDPR compliance

Privacy and Security

We use appropriate technical and organisational measures to best secure your privacy. Encryption, anti-virus, malware, SSL certification, multi password authentication

- Data access is controlled and limited
- All data is stored in a password protected laptop which automatically locks screen after 30 seconds of unattendance.
- Each lap top is encrypted should the lap top itself ever get stolen. A record of encryption certification of is kept in the accountability file.
- Antivirus software is used.
- The website has an SSL certificate from Hosting Ireland to secure the website. It is an additional security measure of encrypting information and meet global security encryption standards, so my clients trust they are browsing or purchasing from www.efitzmarketing.ie securely. The SSL certificate is for the cPanel with Domain Validation, 2048-bit Security and 256 bit Encryption.
- External hard drive storage back up is used and stored separately. All documents on file are on a subscription cloud-based filing system. Cloud based Outlook 365 is also used for storage of emails, which is password protected.
- Security professionals and advice sought by GDPR certified IT professionals
- Passwords are kept in a safe place Passwords are strong and not stored
- Manual Data files are stored in a private office, which is securely locked and no office items are visible to the public.



Data Subject Rights

As a data subject you have rights in relation to your personal data held by Efitz Marketing. You have:

- Data erasure – the right to be forgotten and all data held can be erased when your consent is withdrawn, or the data is no longer necessary or you object to its processing.
- Data restriction – the right to contest further processing of information and contesting its accuracy
- Data portability – the right to have your information transferred to another data controller.
- Data profiling – the right not to be subject to a decision based automated processing.
- Data objection – the right to object to direct marketing, advertising, emails etc.
- Data Access – the right to access personal data held about you

Complaints

Please contact us directly if you have any concerns, complaints, or issues with regards to your personal data held and processed by Efitz Marketing and your general data protection rights. You can freely lodge a complaint with the data protection officer and we will look into your issue immediately. Contact our Data Protection Official at Tramore, Waterford by appointment or by email gdpr@efitzmarketing.ie or by phone 051 391350

Personal data

How we use your information?

This privacy notice tells you how we, Efitz Marketing, will collect and use your personal data for cookies, complaints, subscriptions to services, etc.

The purpose of collecting & storing personal data

Data is collected to fulfil a number of purposes. Data is stored as you opted in for its storage. To provide a service to you, we need to collect information for the use outlined below and for a provision of marketing services. We ensure the appropriate use of all data collected and stored. We are collect personal information for the use as outlined below:

- To provide Efitz Marketing services and event information to the client list
- To promote services and product offerings of Efitz Marketing



- To communicate the latest marketing news and blogs with clients, prospective clients and the public which would be interesting and useful to them
- To advertise work completed and testimonies received by Efitz Marketing

Sharing of your personal data

- Personal information is shared only with staff members to send email campaigns with whom we have confidentiality agreements in place
- Personal data may be passed onto GDPR approved third-party service providers contracted to Efitz Marketing such as emailing programmes, CRM software. These parties known as data processors are contracted legally to also comply with GDPR and keep your details securely. When we or they no longer require your data, or you withdraw consent, it shall be erased.

Usage of Personal Data Obtained

Efitz Marketing will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Efitz Marketing is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Cookies Policy

This cookies policy describes how Efitz Marketing use "cookies" and other similar technologies, such as pixels and tags, in connection with our website.

Does Efitz Marketing use cookies?

Yes. Please read this cookies policy carefully to ensure that you fully understand how and why we use cookies and related technologies. If you use our website with your browser set to accept cookies, you consent to our use of cookies as described in this policy. You also consent to our use of pixel tags if you choose to sign up for our legal update emails.

What is a cookie?

A cookie is a small file consisting of letters and numbers that is placed on your computer or other device. Cookies enable our systems to recognize your device. Such recognition is necessary to for the efficient operation of our site.



Do I have to agree to use of cookies?

No.

If you do not consent to our use of cookies, you can set your browser settings to reject cookies. These settings are usually found in the "options" or "preferences" menu of your web browser. Alternatively, you can use the "Help" option in your web browser get more details.

A number of features of our services may not work or will be curtailed from working effectively without cookies. As a result, changing your browser settings to reject cookies may have a negative impact on your ability to use our website.

If you use our website with your web browser set to accept cookies, you consent to our use of cookies as described in this cookies policy. If you do not accept our use of cookies, you should either (a) immediately stop using our services or (b) use the settings described above to reject cookies. To withdraw your consent to our use of cookies, you should either (a) cease using our website or (b) delete our cookies using your web browser's settings and set your browser to reject future cookies. You can find out more about deleting and blocking cookies using your web browser's "Help" option.

Who drops cookies when I use the website?

Many of the cookies dropped when you use our services are "first party cookies" (meaning cookies placed and read by [company name] directly).

A number of our partners also drop cookies when you use our services. These specialist "third party cookies" are not set by [company name] but are rather set by companies such as Google for website analytics purposes with our permission. Please read our partners' privacy policies to ensure that you're comfortable with the manner in which they use cookies:

www.google.com/analytics/learn/privacy.html

www.fonts.com/info/legal/privacy

What types of cookies are used on [company name] website?

We use both "session" and "persistent" cookies.

A session cookie is used to identify a particular visit to our site. These cookies expire after a short time, or when you close your web browser after using our services.

A persistent cookie will remain on your devices for a set period of time specified in the cookie. We use these cookies where we need to identify you over a longer period of time.

Why are cookies used by Efitz Marketing?

We set some essential cookies, which are required for the operation of the site. The cookies that we set, and their purpose, are detailed below:

- **__cfduid** This cookie by Cloudflare is used to identify individual clients behind a shared IP address and apply security settings on a per-client basis. For example, if the visitor is in a coffee shop where there are a bunch of infected machines, but the specific visitor's machine is trusted (e.g. because they've completed a challenge within your Challenge Passage period), the cookie allows us to identify that client and not



challenge them again. It does not correspond to any user ID in your web application, and does not store any personally identifiable information.

- **wp-settings-1** and **wp-settings-time-1** Our website uses WordPress which uses cookies, or tiny pieces of information stored on your computer, to verify who you are. There are cookies for logged in users and for commenters.
- **Google Analytics:** In addition to the cookies that we set directly, we also use Google Analytics. This is a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate use of those services and compile a report for us. Should you decide that you don't want us to use those cookies, you can set your options with Google at <https://tools.google.com/dlpage/gaoptout>
- **Google Maps:** Cookies from Google may also be set when Google Maps are displayed on some of our website pages i.e Contact Us page. Certain Maps API(s) store and access cookies and other information which is used to provide visitors with our premises location.
- **Mailchimp** MailChimp uses session cookies to help our website remember changes made as our users move from page to page. With secure sites like MailChimp, session cookies work to keep the user logged in so they aren't required to enter their credentials whenever they navigate to a new page. These cookies are deleted after the session ends. MailChimp does not use cookies to track contacts. Links and images are used to track open and clicks for email campaigns.
- **wp-livechat** collects consent-based form entry data, which is safely stored on our support desk for query related purposes; to advise customers on services, to answer customer queries. Customer may request erasure of this information at any time.

The following information may be collected by livechat.com:

Name

Email Address

API Keys

Website URL

Any other personal information you may provide in your messages to us

Data Breach Procedure

The information provided will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure. However, in the event of data being breached the data subject shall be contacted by email, phone or letter. Should there be a large breach, social media alerts, individual messages and website alerts will be made. A PR release indicating the data breach will be released to local papers, national if applicable and the radio stations.

Data Access Procedure

- Efitz Marketing at the subject data's request, can advise what information is being held, its purpose, and how it is processed.



- Personal ID is required when accessing your personal data held by Efitz Marketing. Forms of ID accepted are passport, driving licence or social card
- Subject data has the right to correct, erase, restrict or object to such data processing.
- Information about your right to withdraw consent at any time.
- As for all information held can be requested for your perusal, and also you have the right to review, change, modify, delete, know what information has been collected. Email gdpr@efitzmarketing.ie.
- The data controller can be contacted by email at gdpr@efitzmarketing.ie or by phone on 051 391350 or 089 4342390.
- The data subject has the right to complain to the data protection official and a complaint can be lodged with the Data Processor and Controller.
- Data profiling is used for marketing purposes to highlight services, products, to update data subjects with industry and Efitz Marketing news. You can request information on our data profiling.
- Data is retained until otherwise requested it is removed, becomes too historic, or where there is no response /updates from the data subject or the business is no longer in existence.

Privacy Policy Updates

This privacy policy is available for staff, the public, clients and students on line at <https://www.efitzmarketing.ie/wp-content/uploads/2018/05/Efitz-Marketing-Privacy-Policy.pdf> , on outgoing emails and in a cloud based shared folder.

We will review the privacy policy periodically, and make changes to it in light of different usage of your information. An updated version of this privacy notice is available on our website www.efitzmarketing.ie and on emails. This policy comes into effect on the 24th May 2018 in accordance with GDPR legalisation.

GDPR Owner

Evelyn Fitzmaurice, Tramore, Co. Waterford gdpr@efitzmarketing.ie 051 391350
- Responsible for this document being current and meeting the requirements of GDPR.

Privacy Statement
First issue: 24/05/18
Updated:



Online Privacy policy

<https://www.efitzmarketing.ie/wp-content/uploads/2018/05/Efitz-Marketing-Privacy-Policy.pdf>

