

ALL-STAR
LOGISTICS LTD
Privacy Statement

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1. Definitions used in this statement

- **All Star Logistics Limited, All Star Deliveries Limited, the Company, the Organisation, Us, We, Our**
 - All Star Logistics Limited, Us, We, Our, the Company, the Organisation all refer to All Star Logistics Limited Limited located at Desmond Business Park, Newcastle West, Co. Limerick with registered company number 389306
 - All Star Deliveries Limited is separate sister company of All Star Logistics Limited with common management control.
 - All Star Deliveries is located at Desmond Business Park, Newcastle West, Co. Limerick with registered company number. 336238
 - All Star Deliveries Limited may share employee and payroll details (inter company) with All Star Logistics Limited as they share common management control, data protection and payroll functions.
 - For the purposes of this statement both companies will be referred to together by the terms All Star Logistics Limited, Us, We, Our and the Company.
 - All Star Logistics will manage and facilitate all GDPR and data protection processing functions of All Star Deliveries Limited.

- **You:** You refers to all individuals, organisations and third parties that we require to comply with this statement.

- **Clients, customers or other data subjects:** Clients, customers or other data subjects includes all individuals and organisations currently, historically or prospectively engaging in our services, including website visitors.

- **Services:** Our services include but are not limited to:
 - Warehousing
 - Logistics
 - Deliveries and transportation
 - Administration, HR and other personnel functions required by our company in the course of its business or due to statutory or other obligations.

- **Data Protection Representative:** We have appointed the following individual / organisation to handle all our data protection related queries: Margaret Quirke, Accounts, All Star Logistics.

- **Criminal offence data / Criminal record data** is data which relates to an individual's criminal convictions and offences.

- **Data protection laws**
For the purposes of this statement data Protection laws means all applicable laws

relating to the processing of Personal data, including, for the period during which it is in force, the General Data Protection Regulation (Regulation (EU) 2016/679) and the data Protection Acts 1988 to 2018.

- **Data Subject** means the individual to whom the personal data relates. For the purpose of this statement that may refer to general staff, management staff, creditors, customers for delivery, supplier's staff, website visitors, job applicants or other data subjects whose data is processed by the Company.
- **Personal data** is information that relates to an identifiable person who can be directly or indirectly identified from that information, for example, a person's name, identification number, location, online identifier. It can also include pseudonymised data.
- **Data processing** is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Special categories of personal data** is data which relates to an individual's health, sex life, sexual orientation, race, ethnic origin, political opinion, religion, and trade union membership. It also includes genetic and biometric data (where used for ID purposes).

2. Scope of this privacy statement

- i. This Privacy statement covers our privacy practices with respect to the processing of your Personal data.
- ii. For purposes of the applicable Data Protection Laws, All Star Logistics Limited is the "data controller". This means that All Star Logistics Limited determines the purposes for which, and the manner in which your Personal data is processed.
- iii. This privacy statement describes the information that we collect about you, how we obtain your personal information, and how we may use or disclose that information in connection with the delivery of our services to you or your employment with us. This Privacy statement also describes the measures we take to protect the security of your personal information and how you can contact us about our privacy practices, including to exercise your privacy rights.

3. Data we may collect

- i. We may collect the following data, which includes personal data, in each case, in accordance with this privacy statement from you, customers, suppliers or other relevant data subjects:

- Absences
- Address
- Annual leave
- Bank Account Details
- Timeworks identifier
- Cover letter
- Customer Number
- CV
- Details of qualifications
- Details of work experience
- Details on education and employment history etc
- Details relating to pay administration
- Details of formal and informal proceedings involving staff such as letters of concern, disciplinary and grievance proceedings, your annual leave records appraisal and performance information
- Email
- Full Name
- HR documents - Information relating to employment
- Images / videos CCTV
- Internal and external training modules undertaken
- Job descriptions
- Job title
- Location data
- Managers metrics (KPI)
- Medical or Health information
- Minutes to disciplinary meeting
- Monthly Managers meeting minutes
- One-to-one meeting notes
- Telephone numbers (private and business)
- Picture of house (home of customer)

- PPS numbers
 - Private mobile
 - Qualifications: Details on education and employment history etc
 - Reference number
 - Referee / References from former employers
 - Risk assessments (for under 18 year old employees expectant mothers)
 - Salary level
 - Tax Codes
 - Telephone
 - Terms and conditions of an employee's employment
 - Time date / clock in
 - Wider terms and conditions of employment / role.
 - Supplier contact details (name, work address, title, work email, work telephone)
 - Customers contact details (name, address, phone, email)
- ii. We may process other data required by us to provide our Staff with employment and our clients, customers or other data subjects with our Services.

4. How we may collect data

- i. We may collect data in the following ways:
- a. data is given to us by you;
 - b. data is received from other sources; and
 - c. data may be collected automatically.

5. data that is given to us by you

- i. All Star Logistics Limited may collect your data in a number of ways, in each case, in accordance with this privacy statement, for example:
- a. When you contact us through the Website, by telephone, post, email or through any other means;
 - b. When you receive our products/services;
 - c. When you are employed by us;
 - d. When you enter into a contract with us;

6. Data that may be received from third parties and publicly available sources

- i. All Star Logistics Limited may receive data about you from third parties and publicly available sources in each case, in accordance with this privacy statement that we require in order to deliver our service to you or offer employment to you.

7. Data that may be collected automatically

- i. To the extent that you use our services we may collect your data automatically, for example:
 - a. We may automatically collect some information about your visit to our Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.
 - b. We may collect your data automatically via cookies, in line with our cookie statement and settings on your browser. For more information about cookies, and how we use them on the Website, see our website Terms of Use and Cookie statement

8. Our use of data

i. Any or all of the above data may be required by us from time to time in order to provide you with the best possible experience when using our Services as a Clients, customers or other data subjects or employed by us as a member of our staff.

ii. Specifically, data may be used by us in each case, in accordance with this privacy statement for the following reasons:

- a. The management and administration of our organisation;
- b. Facilitating the delivery of our services and or products;
- c. Human resources management;
- d. For compliance with legislation relevant to the organisation.
- e. For the specific purposes, such as but not limited to,
 - Service provision - warehousing, logistics, deliveries
 - For management and administrative purposes
 - Communications
 - Health and Safety (manual handling)
 - To determine if they are fit for work (health),
 - To register back to work certification,
 - To record work related issues, such as disciplinary or other meetings

- HR purposes,
- health and safety inductions,
- incident reports,
- CCTV for protection of property and security
- To record and investigate accident claims,
- For payroll purposes
- To access the Jobsplus scheme
- deliveries for IKEA of products
- For tracking failed deliveries (IKEA)
- To record meetings inter manager, CEO and one2one, disciplinary with staff
- For upcoming deliveries (other) payments / orders,
- stock control
- setting user accounts / admin for Warehouse management system
- For HR recruitment
- For Training e.g. forklift courses or any other courses
- For random testing for substance misuse in the workplace

iii. We may use your data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).

9. Who we share data with

i. The Company may be required to disclose certain data/information to certain bodies / staff. The circumstances leading to such disclosures include:

- any employee benefits operated by third parties;
- disabled individuals - whether any reasonable adjustments are required to assist them at work;
- individuals' health data - to comply with health and safety or occupational health obligations towards the employee;
- for Statutory Sick Pay purposes;
- HR management and administration - to consider how an individual's health affects his or her ability to do their job;
- The smooth operation of any employee insurance policies or pension plans;
- to assist law enforcement or a relevant authority to prevent or detect crime or prosecute offenders or to assess or collect any tax or duty.

Note: These kinds of disclosures will only be made when strictly necessary for the purpose.

ii. We may share your data with the following organisations to deliver, maintain & improve our service in each case, in accordance with this privacy statement:

- Any of our group companies or affiliates such as All Star Deliveries Limited.

- All Star Deliveries Limited may share employee and payroll details (inter company) with All Star Logistics Limited as they share common management control, data protection and payroll functions.
- Our staff, consultants and/or professional advisors
- Third party service providers who provide services to us which require the processing of personal data
- Relevant authorities (by legal obligation as noted above) such as but not limited to the An Garda Siochana, HSE, HSA, Revenue Commissioners, Tusla or our insurance company.

iii. The sharing of data, as with all other processing of personal data, will be carried out for a legally valid purpose, explained to the data subject where possible, will not be excessive, only stored for the length of time required for the intended purpose kept securely and with a legal basis such as legal obligation, legitimate interest, contract or consent or other legal basis as the basis for processing as appropriate. If the sharing of personal data includes special category data the data controller will only share when complying with the additional conditions as detailed by Article 9 of the GDPR.

10. Keeping data secure

- i. We will use technical and organisational measures to safeguard your data, for example:
 - a. Our staff are governed by a strictly enforced data protection policy.
 - b. Our systems are configured, maintained and monitored to ensure the best possible technical measures we can achieve. These have been implemented to secure your data.
 - c. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your data, please let us know immediately by contacting us.

11. Data retention

- i. Unless a longer retention period is required or permitted by law, we will only hold your data on our systems for the period necessary to fulfil the purposes outlined in this privacy statement or until you request that the data be deleted.
- ii. Even if we delete your data, it may persist on backup or archival media for legal, tax or regulatory purposes.

12. Your rights

- i. When our work involves processing personal data we comply with the following data protection principles which require that;

- **Processing will be fair, lawful and transparent:** We must always have a lawful basis to process personal data, as set out in the data protection laws. The legal bases for processing data, as detailed in Article 6 of the GDPR are consent, contract, vital interest, legitimate interest, public task or legal obligation. Personal data may be processed as necessary;
 1. To deliver services to the data subject,
 2. To comply with a legal obligation which the data controller is the subject of,
 3. Or for the legitimate interests of the data controller or the party to whom the data is disclosed.
 4. The data subject must be told
 - a. who controls the data (us),
 - b. the purpose(s) for which we are processing the data and
 - c. to whom it may be disclosed.

- **Data be collected for specific, explicit, and legitimate purposes.**
 - Personal data must not be collected for one purpose and then used for another.
 - If we want to change the way we use personal data, we must first tell the data subject.

- **Processed only where it is adequate, relevant and limited to what is necessary for the purposes of processing.** We will only collect personal data to the extent required for the specific purpose notified to the data subject.

- **Data will be kept accurate and up to date.** data which is found to be inaccurate will be rectified or erased without delay
 - All Star Logistics Limited takes all reasonable steps to ensure that data that is inaccurate is rectified or deleted without delay.
 - Checks to personal data will be made when collected and regular checks must be made afterwards.
 - We will make reasonable efforts to rectify or erase inaccurate data.

- **Data is not kept for longer than is necessary for its given purpose.** data will not be kept longer than it is needed and we will take all reasonable steps to delete data when we no longer need it.

- **Data will be kept secure.** data will be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures/ Secure, and appropriate measures are adopted by All Star Logistics Limited to ensure as such. In addition we will comply with the relevant GDPR procedures for international transfer of personal data

ii. You have the following rights in relation to your data:

- **Right to be informed:** You have the right to be informed of how we process your data. We comply with this right through the issuing of this Privacy statement.
- **Right to access:** The right to request
 - Copies of the information we hold about you at any time, or
 - That we modify, update or delete such information.
 - If we provide you with access to the information, we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request.
 - If we refuse your request, we will tell you the reasons why.
 - To invoke your right to access please request our Subject Access Request form to complete and return to us.
- **Right to rectification:** The right to have your data rectified if it is inaccurate or incomplete.
- **Right to erase:** The right to request that we delete or remove your data from our systems.
- **Right to restrict our use of your data:** The right to "block" us from using your data or limit the way in which we can use it.
- **Right to data portability:** The right to request that we move, copy or transfer your data.
- **Right to object:** The right to object to our use of your data including where we use it for our legitimate interests.
- **Rights related to automated decision making and profiling.** You have rights related to automated decision making and profiling, however this is not a type of processing activity that we as an organisation engage in.

iii. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your data (where consent is our legal basis for processing your data), please contact us

Postal:	Margaret Quirke, All Star Logistics, Desmond Business Park, Newcastle West, Co. Limerick
Email:	accounts@all-starlogistics.com
Telephone:	069-66478.

iv. If you are not satisfied with the way a complaint you make in relation to your data is handled by us, you may be able to refer your complaint to the relevant data protection authority.

v. The data controller will make every effort to comply with data subjects rights' requests however there may be instances where we cannot fulfill the request of these rights above due to a legal obligation or restriction dictated by the current data protection or other relevant legislation. If we refuse a request from the data subject we will explain this to the data subject immediately and the data subject has the right to query this to the national supervisory authority.

vi. The data subject has the right to refer their complaint to the relevant national data protection supervisory authority which in Ireland is the Data Protection Commission, please find contact details below;

By Post: Data Protection Commission
21 Fitzwilliam Square South
Dublin 2
D02 RD28
Ireland

By Email: Info@dataprotection.ie
By Phone: +353 (0) 578 684 800
Web: www.dataprotection.ie

v. It is important that the data we hold about you is accurate and current. Please keep us informed if your data changes during the period for which it is held.

13. Transfers outside the European Economic Area

- i. The Company does not currently transfer personal data to any recipients outside of the EEA.
- ii. However in future data which we may collect from you could be stored and processed in and transferred to countries outside of the European Economic Area (EEA).
 - a. For example, this could occur if our servers are located in a country outside the EEA or one of our service providers is situated in a country outside the EEA.
 - b. We also share information with our third party service providers, some of which are located outside the EEA.
- iii. We will only transfer data outside the EEA where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data,
 - a. E.g. by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission, or by signing up to the EU-US Privacy Shield Framework, in the event that the organisation in receipt of the data is based in the United States of America.
- iv. To ensure that your data receives an adequate level of protection, we have put in place appropriate safeguards and procedures with the third parties we share your data with.
 - a. This ensures your data is treated by those third parties in a way that is consistent with the data Protection Laws.

14. Changes of organisation structure and control

- i. All Star Logistics Limited may, from time to time, expand or reduce our organisation and this may involve the transfer of control of all or part of All Star Logistics Limited.
- ii. data provided by clients will, where it is relevant to any part of our organisation so transferred, be transferred along with that part. The new owner or newly controlling party will, under the terms of this Privacy statement, be permitted to use the data for the purposes for which it was originally supplied to us.
- iii. We may also disclose data to a prospective controller of our organisation or any part of it.
- iv. In the above instances, we will take steps to ensure your privacy is protected.

15. General

- i. You may not transfer any of your rights under this privacy statement to any other person.
 - a. We may transfer our rights under this privacy statement where we reasonably believe your rights will not be affected.
- ii. If any court or competent authority finds that any provision of this privacy statement (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy statement will not be affected.
- iii. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
- iv. This Agreement will be governed by and interpreted according to Irish Law. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the Irish courts.

16.Changes to this privacy statement

- i. All Star Logistics Limited reserves the right to change this privacy statement as we may deem necessary from time to time or as may be required by law.
- ii. You may contact All Star Logistics Limited with any queries in relation to this Privacy statement.