



Document Control Sheet

Revision	Date	Description of changes/amendments	Prepared by	Approved by
00	24/05/2018	New policy developed	R Fleming	

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Appendix 1

TLI Group,
Beenreigh,
Abbeydorney,
Tralee,
Co. Kerry,
Rep. of Ireland.

1. Scope

This policy applies to all workplaces under TLI Group control, all TLI Group employees and subcontractors.

2. Introduction

TLI Group processes personal data for the following purposes:

- Client administration;
- Provision of goods or services;
- Legal obligations;
- Employee administration;
- Monitoring (e.g. CCTV, Vehicle Tracking, Web History, Apps, Cookies);
- Processing for a third party.

The legal basis for this processing is:

- Consent;
- Legitimate staff management interests including health and safety obligations;
- Performance of a contract including possible consequences of failing to provide the personal data;
- Legal obligation in relation to Employment Law, including possible consequences of failing to provide the personal data.

3. Recipients of the personal data

List of specific agencies/regulators to whom data is disclosed:

- Clients, when data is relevant to their project;
- Sub contracted resource (Wayleave/Installation crews);
- Statutory bodies such as Revenue/HMRC.

4. Data Retention Period

Data will be retained as outlined in the following table:

Data Type	Retention Period	Basis of Retention	Data Controller Criteria
CV	1 – 2 years	Data Controller	Reasonable beneficial time period
Employee data	2 – 3 years / 7 years	Data Controller / Employment Law	Past employee data retained for 2-3 years. Statutory data retained for 7 years.
Employee Training records	2 – 3 years	Data Controller	Past Employee data retained for 2-3 years following employment.
BER records	10 years	SEAI legislation	
Client details	5 years	Consent	No direct marketing undertaken by TLI Group
Landowner Details	2 – 3 years	Contract requirements	

5. Your Rights

You have the following rights in respect to the personal data that TLI Group have on file for you. Please contact us at the company address (Appendix 1 Page 2) in order to exercise any of these rights:

1. The right to be informed:
 - You have the right to receive “fair processing information”.
2. The right of access. You have the right to obtain:
 - Confirmation of your personal data being processed;
 - Access to a copy of your personal data;
 - And any other supplementary information.
3. The right to rectification:

- You have the right to have your personal data rectified if it is inaccurate or incomplete.
4. The right to erasure (includes withdrawal of consent). You have the right to have your personal data erased, in the following circumstances:
 - You withdraw consent;
 - The personal data must be deleted to comply with a legal obligation;
 - The personal data was unlawfully processed;
 - Where the personal data is no longer necessary in relation to the purpose for which it was originally collected;
 - Where you object to the processing and there is no superseding legitimate requirement to continue the processing;
 - The personal data is processed in relation to the offer of “information society services” to a child.
 5. The right to restrict processing:
 - You have the right to ‘block’ or suppress processing of personal data.
 6. The right to data portability:
 - You have the right to obtain and reuse their personal data for their own purposes across different services.
 7. The right to object. You have the right to object to:
 - Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
 - Direct marketing (including profiling);
 - Processing for purposes of scientific/historical research and statistics.
 8. You have rights in relation to automated decision making and profiling. You have the right not to be subject to a decision when:
 - It is based on automated processing;
 - It produces a legal effect or a similarly significant effect on the data subject.

6. The right to complain

If you feel that TLI Group has not fulfilled its obligations under the General Data Protection Regulation 2016/679, then you have the right to lodge a complaint with the Data Protection Commissioner (DPC).

The DPC offers guidance on how to make a complaint here:

<https://www.dataprotection.ie/docs/Making-a-Complaint-to-the-Data-Protection-Commissioner/r/18.htm>

7. Automated decision making, including profiling

TLI Group carry out automated decision making/profiling:

- TLI Group use vehicle tracking devices and analyse the data to profile driver behaviour and monitor violations;
- These outcomes prompt follow up actions such as informing the drivers responsible, driver training and disciplinary action where required.