

Privacy Notice

About Us

We are Airfibre Limited with a registered address at 4 Adelaide Street, Dún Laoghaire, Co. Dublin, A96 Y430.

In addition to being an Internet Service Provider, we supply network management/monitoring and security appliances as well as WiFi solutions.

What is the purpose of this Privacy Notice?

Airfibre may collect and use personal data (personal information) about individuals who come in contact with us, for a variety of purposes. In circumstances where we are responsible for deciding how we hold and use personal data about individuals, we are a “data controller”.

This Privacy Notice outlines what personal data we collect and use about individuals in connection with the services and functions of Airfibre, where we obtain the personal data from, what we do with that personal data, how we comply with data protection legislation, who receives personal data from us and how we deal with individuals’ rights in relation to their personal data.

This Privacy Notice also explains what personal data we collect and use about individuals who use our website (www.airfibre.ie) where we use cookies.

The primary data protection legislation that applies to us is the EU General Data Protection Regulation (the GDPR) effective from 25 May 2018, supplemented by Irish legislation (primarily the Data Protection Acts 1988 – 2018 and ePrivacy Regulations 2011). One of our obligations under the GDPR is to be transparent with you about our collection and use of personal information about individuals.

What information we hold about you and why

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been (permanently and irrevocably) removed (anonymous data).

- Bank details, where relevant.
- Name, title, business contact details (including email, land line and, where provided, mobile number).
- Other personal information about the activities of individuals in relation to business activities

About visitors to our website or our offices and premises:-

- Browsing information about what sections of our website were browsed, when, and whether the person was a repeat browser. (This information is collected using “cookies”).
- Details provided or information uploaded when using requesting information.

Other Information

- Names, addresses and other contact details of journalists to which we send news alerts.
- Names, addresses and other contact details of individuals who have attended our seminars and who are on the invitation lists for future seminars.
- Names, addresses, contact details, CVs, professional profiles and other personal information provided as part of employment applications submitted to us.
- Names, titles and work contact details of individuals who work for our customers, resellers and service providers.

How is your personal information collected?

- Directly from individuals themselves or their nominated representatives.
- From individuals' employers.
- Through our website.
- From the Gardai (regarding suspected breaches of law).

Basis of our use of your personal information

Airfibre will only use your personal information when the law allows us to.

Where we are permitted by relevant legislation to do so in the context of marketing communications.

When reporting and resolving network service and product issues.

We may also use your personal information in the following situations, which are likely to be unusual:-

Where we need to protect your vital interests (or someone else's vital interests).

To invite individuals to attend our seminars and information meetings and keep information about who attended.

To market to individuals, where this not covered by our legal obligations to provide information.

In relation to use of our website, to enable us to understand how users interact with the website so that we can improve the content, navigation or other features of the website.

If you fail to provide personal information

If you fail to provide certain information when requested by Airfibre, we may not be able to respond or deal with a request that you have made to us.

Right to withdraw consent

To withdraw your consent, please email an instruction to support@airfibre.ie. Once we have received notification that you have withdrawn your consent, we will no longer process your information, unless we have another legitimate basis for doing so in law.

Third Parties

We may share your data with third parties, including our third-party service providers and other recipients in order to address product and services issues and to provide information to you as requested by you.

We may share your data with our auditors and solicitors (to the extent that they might need to review our records in order to provide professional services to us).

We require all our data processors to respect the security of your personal information and to treat it in accordance with the law.

We will share your personal information with these third parties where required by law, or where we have legitimate interest in doing so.

We may transfer your personal information outside the EU, for example, to manufacturers and suppliers whose assistance is required to resolve technical issues.

If we do, you can expect a similar degree of protection in respect of your personal information.

Data security

We have put in place measures to protect the security of your personal information.

Our third-party service providers (data processors) will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

We have put in place procedures to deal with any suspected data security breach (including personal data breach) and will notify you and any applicable regulator of a suspected personal data breach where we are legally required to do so.

Data retention: how long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. If legislation requires us to retain personal data for a specified period, then we retain it in accordance with those legislative obligations.

We may retain your personal information for a longer period where we need it in order to make or defend legal claims, and if this happens, we will retain the personal information for as long as it takes to resolve the legal claim or have it finally determined by a court.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it
- **Request the transfer** of your personal information to another party.

How to make requests to us to exercise your rights

If you want to review, verify, access, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please email support@airfibre.ie giving as much information as possible to help us to verify who you are and what your request is about.

Fees

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the personal information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request in order to speed up our response.

Time limit for us to respond to requests

We try to respond to all legitimate requests within one month of receiving them. (One month is the specified time limit for response under the GDPR.) Occasionally, it may take us longer than a month if your request is particularly complex or if you have made a number of requests. In this case, we will notify you and keep you updated about our timing for response.

Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time, and where we do so we will post the updated version on our website www.airfibre.ie