Ireland Alloys Ltd

Data Protection and Privacy Policy

1. Policy Statement

Ireland Alloys Ltd is committed to protecting the privacy and security of all personal information that we hold. We handle data responsibly and in compliance with the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018**, and all relevant **Scottish laws** and regulatory guidance.

We collect and process personal data lawfully, fairly, and transparently, ensuring that individual rights are respected and protected at all times.

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2. Purpose

The purpose of this policy is to explain:

- How Ireland Alloys Ltd collects, uses, stores, and protects personal information.
- The rights of individuals under data protection law.
- The company's responsibilities in managing and safeguarding data.
- How individuals can access or control their personal data.

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3. Scope

This policy applies to:

- All employees, directors, officers, contractors, consultants, suppliers, and third parties acting on behalf of Ireland Alloys Ltd.
- All personal data collected or processed by the company, whether in paper or electronic form.
- All business activities within Scotland, the wider UK, and internationally (where applicable).

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4. Legal Framework

This policy is governed by:

- **UK GDPR** (incorporated into UK law via the **Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019**).
- **Data Protection Act 2018**.
- **Privacy and Electronic Communications Regulations 2003 (PECR)**;
- Relevant Scottish civil and criminal law provisions.

These laws require that personal data must be:

1. Processed lawfully, fairly, and transparently.
2. Collected for specified, explicit, and legitimate purposes.
3. Adequate, relevant, and limited to what is necessary.
4. Accurate and kept up to date.
5. Kept only as long as necessary.
6. Processed securely.

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5. What Personal Data We Collect

Ireland Alloys Ltd may collect and process the following categories of personal data, depending on the relationship:

5.1 Employee and Contractor Data

- Full name, address, and contact details.
- Date of birth, national insurance number, and tax information.
- Employment history, qualifications, and references.
- Payroll and bank details.
- Health and safety information.
- Emergency contact details.

5.2 Supplier and Customer Data

- Business contact names, phone numbers, and email addresses.
- Company registration, VAT, and payment details.
- Contractual correspondence and service information.

5.3 Website and Communication Data

- IP addresses, cookies, and online identifiers (where applicable);
- Information voluntarily provided through enquiries or forms.

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6. Lawful Basis for Processing

Ireland Alloys Ltd will only process personal data when a lawful basis exists under Article 6 of the UK GDPR. These include:

- **Contractual necessity** – processing required to perform a contract.
- **Legal obligation** – to comply with statutory requirements (e.g. employment or tax law).
- **Legitimate interests** – for the effective running of our business.
- **Consent** – where explicit consent has been provided.
- **Vital interests** – to protect an individual's safety.
- **Public interest** – when required for official purposes or by law enforcement.

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7. How We Use Personal Data

We use personal data to:

- Manage employment relationships.
- Administer payroll, pensions, and benefits.
- Communicate with suppliers, customers, and business partners.
- Maintain safety, security, and compliance within our operations.
- Improve our services and operational efficiency.
- Comply with legal and regulatory obligations.

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8. Data Sharing and Disclosure

We may share personal data with:

- HM Revenue & Customs, regulators, or law enforcement agencies (when legally required).
- External payroll, pension, or benefit providers.
- IT, HR, or professional service providers acting under contract.
- Clients or suppliers for legitimate business purposes.

We will never sell personal data to third parties. All external parties must comply with UK data protection law and maintain appropriate security measures.

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9. Data Retention

We retain personal data only as long as necessary for the purposes for which it was collected, in accordance with:

- Legal and regulatory requirements.

- Contractual obligations.
- Our internal data retention schedule.

Once data is no longer required, it will be securely deleted or destroyed.

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10. Data Security

Ireland Alloys Ltd implements technical and organisational measures to safeguard personal data, including:

- Secure servers and encrypted communications.
- Controlled access and password protection.
- Regular security audits and staff training.
- Procedures for data breach detection, reporting, and response.

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11. Individual Rights

Under the UK GDPR and Data Protection Act 2018, individuals have the following rights:

1. **Right to be informed** – to know how their data is used.
2. **Right of access** – to request copies of their personal data.
3. **Right to rectification** – to correct inaccurate or incomplete data.
4. **Right to erasure** ("right to be forgotten").
5. **Right to restrict processing**.
6. **Right to data portability**.
7. **Right to object** to processing.
8. **Rights in relation to automated decision-making and profiling**.

Requests should be made in writing to the company's **Data Protection Officer** (details below). We will respond within one month, in line with legal requirements.

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12. Data Breaches

In the event of a data breach, Ireland Alloys Ltd will:

- Contain and assess the breach immediately.
- Notify the **Information Commissioner's Office (ICO)** within 72 hours where required.
- Inform affected individuals if there is a high risk to their rights and freedoms.
- Maintain a record of all breaches, regardless of severity.

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13. Data Protection Officer (DPO)

The designated person responsible for overseeing data protection compliance is:

Data Protection Officer

The Managing Director
Ireland Alloys Ltd
Whistleberry Road, Hamilton, ML3 0HP

01698 822461

The DPO ensures compliance with the UK GDPR and provides advice and support on data handling practices.

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14. International Data Transfers

If any personal data is transferred outside the UK, it will only occur where:

- The destination country ensures an adequate level of data protection (as recognised by the UK government); or
- Appropriate safeguards (such as Standard Contractual Clauses) are in place.

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15. Staff Responsibilities

All employees are responsible for:

- Handling personal data in line with this policy.
- Reporting data breaches or security concerns immediately.
- Completing regular data protection and privacy training.

Failure to comply with this policy may result in disciplinary action.

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16. Monitoring and Review

This policy will be reviewed **annually** or sooner if legislation or business practices change.
The Board of Directors is responsible for ensuring ongoing compliance and continuous improvement in data protection standards.

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17. Complaints

If you believe that Ireland Alloys Ltd has not handled your personal data properly, please contact our Data Protection Officer in the first instance. If you are not satisfied with our response, you have the right to lodge a complaint with:

Information Commissioner's Office (ICO)
45 Melville Street
Edinburgh EH3 7HL
Website: www.ico.org.uk
Telephone: 0303 123 1113

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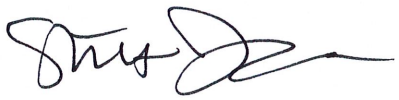
18. Approval

This Data Protection and Privacy Policy have been approved by the **Board of Directors** of Ireland Alloys Ltd and is effective from **1 July 2026**.

Signed: 

Stuart Douglas
Managing Director
Ireland Alloys Ltd
1.7.26