

## **Privacy Policy:**

### **1. Introduction**

Applegreen Ltd is a private limited company, registered address 17 Joyce Way, Park West Business Park, Dublin 12 and is the data controller of any personal data you provide in the context of engaging our services.

We are committed to protecting your personal data in compliance with data protection principles. You may contact us at any time to exercise your rights as a data subject or where you require further clarification on the information provided in this policy by emailing [dpo@applegreen.ie](mailto:dpo@applegreen.ie)

By using this Mobile App you are agreeing to the use of your personal data as described in this Privacy Notice.

### **2. Purposes of Data Collection**

#### **Performance of a Contract**

Where you voluntarily submit your details to register to become a member of our Rewards Programme, we rely on Article 6(b) of the General Data Protection Regulation (GDPR) to provide the legal basis for collecting and processing your personal data for this purpose (ie. we require your personal data to fulfil the performance of this agreement with you).

#### **Consent**

We rely on Article 6(1)(a) to send you electronic marketing communications via the communication channel you have selected to receive such communications (ie. email, SMS, In-App etc.) if you provide your 'opt in' consent to receiving such communications when you register to become a member of our Rewards Programme.

#### **Legitimate Interests**

Where you provide your details to us for the purposes of enquiring about our products or services or raising a customer service issue with us, we rely on legitimate interests to do so. We also rely on Article 6(f) of the GDPR to process your personal data for the purpose of running analytics on our sales and Mobile App to determine how we can optimise and improve the Mobile App for the benefit of our customers.

#### **Compliance with a legal obligation**

When we are required under law to process your personal data, we rely on Article 6(1)(c) of the GDPR to do so.

### **3. Categories of Data Collected**

We only collect personal data that is provided by you (ie. name, address, telephone number, email address). We require this information to register and create your Rewards account.

The Account Creation section of the Mobile App requires you to login and provide certain personal information (such as your name, postal address and email address) in order to be able to save your profile information and create your Rewards Account. In order to enable these or any other login-based features, we use cookies to store session information for our convenience. See our [Cookies Policy](#). You can block or delete cookies and still be able to use the Mobile App, although if you do you

will then be asked for your username and password every time you login to the Mobile App. We also use cookies on our Mobile App for the purposes of Mobile App functionality and optimising your browsing experience. For more information on cookies please refer to our [Cookies Policy](#)

#### **4. How is your Data Processed?**

Your data is automatically synced with our servers and will be processed internally for the purposes for which you provide your data. All our employees have undergone training in data protection and have been trained to ensure that your personal data is kept confidential, safe and secure.

#### **5. Who will this information be shared with?**

Your privacy is very important to us. Your personal data may be shared with business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.

We may disclose your personal data for the purposes of complying with legal and regulatory requirements, such as anti-money laundering legislation, and for the prevention or detection of fraud. For this purpose, we may share personal information with third parties, including, without limitation, Law Enforcement, organisations involved in fraud prevention and detection and (for the purposes of complying with an order of the courts) banks, financial institutions and credit reference agencies.

We also use social buttons provided by services like Twitter and Facebook. Your use of these third-party services is entirely optional. We are not responsible for the privacy policies and/or practices of these third-party services, and you are responsible for reading and understanding those third-party services' privacy policies.

In the event of a purchase or sale of the business, we may disclose your personal data to third parties who are prospective buyers or sellers of such businesses or assets. If the Company or its assets are sold to a third party, personal data will be transferred as part of the transaction. However, the Company will ensure to the best of its ability that the privacy of your personal data is maintained on an ongoing basis.

#### **6. How long will we hold your information?**

Personal data will be kept for as long as it is legally required to be kept, provided the business has a legitimate need to keep the data for the purposes for which it is originally collected.

Where we hold personal data in connection with your Account or the Rewards Programme we will hold the information for as long as it is required to fulfil the terms of that agreement with you and for a period of 6 years after the end of the customer relationship thereafter to ensure compliance with Revenue requirements.

Other information will be retained by us for no longer than is necessary for the purposes for which it was obtained or as required or permitted for legal, regulatory, fraud prevention and legitimate business purposes. Retention periods for other records are available in the organisational retention schedule which can be requested from the Data Protection Officer.

Where you would like your information to be deleted, please refer to Section 8 below.

#### **7. Transfers to Third Countries**

Where personal data that is processed for the purposes of providing our services to you and where this requires the transfer of this data outside of the EEA.

Where personal data is transferred outside of the EEA, your rights as a data subject are protected by data transfer mechanisms such as Standard Contractual Clauses.

## **8. Your Rights**

You have a number of rights as a data subject which you may choose to exercise at any time by contacting us at [dpo@applegreen.ie](mailto:dpo@applegreen.ie)

### **Access to Personal Data**

Where you wish to access a copy of your personal data held by us, you may do so by contacting us at [dpo@applegreen.ie](mailto:dpo@applegreen.ie) and we will respond to this request in 30 days.

### **Rectification or Erasure of Personal Data**

Where you wish the data that we hold on you to be rectified, you have the right to request this in writing. Where you wish to exercise your right to have your personal data erased, we will do so without undue delay, subject to the exemptions provided in Article 17(3) of the GDPR.

### **Restriction of Processing**

You have the right to obtain restriction of processing of your personal data where you contest the accuracy of the data for a period allowing us to verify the accuracy of the data; where the processing is unlawful and you oppose the erasure of your data and request the restriction of its use instead; where we no longer need the data for the purposes for which it was collected but it is required by you for legal purposes; where you have objected to the processing pursuant to Article 21(1).

### **Right to Data Portability**

You have the right to receive your personal data in a structured, commonly used and machine-readable format and have the right to transmit this data to another controller.

### **Right to Object**

You have the right to object to the processing of your personal data where your data is processed on the basis of our legitimate interests.

## **9. Security**

Where data is stored electronically, we have implemented appropriate security measures to protect your personal data against unauthorised access, alteration, destruction or disclosure. Access to and management of data is limited to those staff members who have appropriate authorisation. Where data is stored in hard copy format, we have procedures in place and staff training to ensure that paper records are stored securely. Unfortunately, no data transmission over the Internet or electronic storage system can be guaranteed as secure, however, we will ensure that the technical and organisational measures in place are regularly reviewed to ensure that they are up-to-date and functioning effectively.

## **10. Amendments of this Privacy Notice**

This Privacy Statement may be updated to reflect changes in privacy legislation, and any changes to this Notice should be reviewed when accessing the website.

**11. Third Party Sites**

Where links to third party websites are provided, we do not accept any liability or responsibility for the content or security of these websites.

**12. Governing Law and Jurisdiction**

This notice and all issues regarding this website are governed exclusively by Irish law and are subject to the exclusive jurisdiction of the Irish courts.

**13. Contact Us**

If you have any further questions regarding how your personal data is processed by us, you may contact us at [dpo@applegreen.ie](mailto:dpo@applegreen.ie)