

## Combo Therapy - Privacy Notice

Reader Information	Title: Privacy Notice
Purpose:	To outline the approved Combo Therapy's management approach to be followed in relation to Privacy Notice
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Target Audience:	All Staff, Customers, Suppliers and third parties that have access to Combo Therapy's information.
Superseded Documents:	All other Privacy Notices.
Review Date:	18/05/2021
Contact Details:	Combo Therapy at 33, Boru Court, Grange Road, Ballina, Co. Tipperary - E-mail <a href="mailto:combotherapy.com">combotherapy.com</a>

### Privacy Notice

Combo Therapy are committed to safeguarding the privacy of your personal data. Please read the following Privacy Notice to understand how we collect and use your personal data, for example when you contact us, visit our website, or seek to avail of our services. The Data Controller is Combo Therapy, we can be contacted through [Combotherapy.com](http://Combotherapy.com) or through our registered office, which is located at 33, Boru Court, Grange Road, Ballina, Co. Tipperary. Please note that whenever you provide us with your personal data, that processing it involves the collection, recording, organising, structuring, storing, adaptation, alteration, retrieving, consulting, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### What Personal data do we collect?

Combo Therapy may collect personal data such as your name and e-mail address through our website interface on [www.combo-therapy.com](http://www.combo-therapy.com) or through completion of our business form(s), e-mail communication, or other means of communication or contact that we may have with you. A full list of the personal data that we process is listed in the appendix attached to this Privacy Notice.

### How we use your personal data

If you provide personal data to us, we will process that information and use it for the purposes outlined in the Appendix and in accordance with the terms and references within this Privacy Notice.

## **Obligation to provide personal data**

You are not obliged to provide your personal data to Combo Therapy, you may provide your name, address, contact details or e-mail address (as applicable) as a point of contact. The purpose of collecting / processing your personal data is outlined in the appendix attached to this Privacy Notice which outlines the categories of personal data processed in aiding the delivery of our services etc. Failure to provide personal data will create difficulties in delivering our services. The provision of personal or special category data is required mainly in relation to aiding the provision of goods/ products / services supplied by our business.

## **Explanation as to how the personal data could not possibly be processed by any other means.**

Failure to provide personal or special category data may create difficulties in delivering our services. In such event we would have no other means of processing your requirements.

## **Sharing / Recipients of your personal data**

When you provide Combo Therapy with your personal data, that data will be used, processed or stored in Combo Therapy. We share your personal or special category data with the undermentioned.

Customer's Personal Data is shared with No third party has access to client's personal data except in accordance with law, unless requested by the client for details to be shared with specified third parties.

Creditor's Personal Data is shared with Therapist and Revenue Commissioners.

Covid-19 Personal Data is shared with Therapist, Department of Health, HSE Contracting Tracing Officials, Insurance Company'

Combo Therapy will not share or pass on your personal data to any other persons or third parties, third countries or international organisations other than those specified above unless you specifically request this.

In the event that we receive requests from government departments, agencies or other official bodies, we will only disclose your information, if and to the extent that we believe we are legally required to do so (for example, but without limitation, upon receipt of a court order, warrant, subpoena or equivalent). Except as set out above, we will not disclose your personal data save where we need to do so in order to enforce our rights.

If we are compelled to share your personal data, we take all reasonable steps to ensure that it is treated securely and in accordance with this Privacy Notice.

## **Transfer to third country**

The GDPR and Data Protection Acts require that Combo Therapy specify whether or not it transfers personal data to any third country or international organisation.

Combo Therapy does not transfer personal data to any third country.

## **Period of retention of personal data**

Personal data provided to Combo Therapy will be retained for a period of time depending on the purpose of collecting / processing of each category of personal data or for a period as required by relevant legislation.

1. The schedule for the retention of each category of data is listed opposite each category of data in the Appendix to this Privacy Notice.

2. The retention period for business documents in relation to Revenue records is available at <https://www.revenue.ie/en/vat/vat-records-invoices-and-credit-notes/vat-records-to-be-kept/how-long-do-you-keep-records-for.aspx>

## **Product and service-related data**

If you avail of our services or are employed by Combo Therapy, we may collect and process your personal and special categories of data as is outlined in the Appendix attached to this document.

In order to continuously provide our services, it may be necessary for us to collect and process certain information relating to you. The information we collect / process may include personal and or special category data as is outlined in the Appendix attached to this Privacy Notice.

We are committed to safeguarding the privacy of your personal and special category data and we will never share this outside of those mentioned above.

## **Notice of Data Subject Rights**

### **Right of Access**

The data subject has the rights to obtain from Combo Therapy (Controller) confirmation as to whether or not personal data concerning him or her is being processed and where such personal data is being processed, he / she will have the right to access their personal data and ascertain the purpose of any processing, the categories of personal data concerned, the

recipients or categories of recipient to whom the personal data has been or will be disclosed, in particular any recipients in third countries or international organisations, the period for which the personal data will be retained or stored or if not possible the criteria used to determine that period, the right to request from the controller rectification or erasure of their personal data or restriction of processing of personal data concerning the data subject or their right to object to such processing, the right to lodge a complaint to the supervisory authority (Data Protection Commissioner), in the event that the personal data was not collected from the data subject any available information as to their source and the existence of any automated decision-making profiling and at least in such events meaningful information about the logic involved as well as the significance and the envisaged consequences of such processing for the data subject. In the event of personal data being transferred to a third country or to an international organisation the data subject has the right to be informed of the appropriate safeguards relating to the transfer. The data subject also has the right to obtain a copy of the personal data undergoing processing from the controller.

### **Right to Rectification**

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### **Right to erasure ('right to be forgotten')**

The data subject has the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall be obliged to erase their personal data without undue delay where one of the following grounds applies:

- (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) the data subject withdraws consent to the processing of his or her personal data for one or more specific purposes, or where the European Union or Member State law prohibit the consenting by data subjects to the processing of special categories of personal data and where there is no other legal ground for the processing;
- (c) the data subject objects to the processing on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her based on the grounds that processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller or processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular

where the data subject is a child (except where processing is carried out by public authorities in the performance of their tasks) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing of their personal data for direct marketing purposes including profiling for direct marketing purposes .

(d) the personal data has been unlawfully processed;

(e) the personal data has to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;

(f) the personal data has been collected in relation to the offer of information society services from a child under the age of 16 years of age and the consent for the processing of that child's personal information has not been given or authorised by the holder of parental responsibility over the child .

*The above requirements in relation to the right to erasure shall not apply to the extent that processing is necessary:*

(a) for exercising the right of freedom of expression and information;

(b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

(c) when processing personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation is for reasons of public interest in the area of public health or where such data is processed by or under the responsibility of a professional subject to the obligation of professional secrecy under Union or Member State law or rules established by national competent bodies or by another person also subject to an obligation of secrecy under Union or Member State law or rules established by national competent bodies.

(d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subjected to the appropriate safeguards being put in place in accordance with this regulation, protecting the rights and freedoms of the data subject by the putting in place technical and organisational measures to ensure respect for the principle of data minimisation, which may include pseudonymisation; provided such purposes can be fulfilled in that manner or where further purposes for processing of such data does not permit or no longer permits the identification of data subjects, then those purposes shall be fulfilled in that manner so as to render impossible or seriously impair the achievements of the objectives of that processing or

(e) for the establishment, exercise or defence of legal claims.

**Right to restriction of processing**

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

(a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;

(b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

(c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;

(d) the data subject has objected to processing on grounds relating to his or her particular situation, to processing of personal data concerning him or her which is based on the fact that processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller or where processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child, with the exception of processing carried out by public authorities in the performance of their tasks; pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted under the above conditions, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

A data subject who has obtained restriction of processing pursuant to the above-mentioned conditions shall be informed by the controller before the restriction of processing is lifted. Right to notification obligation regarding rectification or erasure of personal data or restriction of processing. The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with their right to rectification, erasure, and restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.

## **Right to data portability**

1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes or the data subject has given explicit consent to the processing of personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition the processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation may not be lifted by the data subject; if the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to above may not be lifted by the data subject or on a contract where the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract ; and

(b) the processing is carried out by automated means.

2. In exercising his or her right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

3. The exercise of the right to data portability shall be without prejudice to the data subject's right to erasure Article 17. which shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

4. provided that the right of data portability of a data subject shall not adversely affect the rights and freedoms of others.

## **Right to object**

1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; or where processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a

child or (processing carried out by public authorities in the performance of their tasks) including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

4. This right to object should be brought to the notice of the data subject at the very first communication and shall be presented clearly and separately from any other information.

5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.

6. Where personal data are processed for scientific or historical research purposes or statistical purposes Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

### **Right to withdraw consent**

Where the processing is based on the data subject having given consent to the processing of his or her personal data for one or more specific purposes except where Union or Member State law provide that the prohibition the right to withdraw his or her consent may not be lifted by the data subject; or where consent to processing of his or her personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation the data subject has the right to withdraw the consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

### **Time frame to respond to requests**

If you exercise any of your rights under the General Data Protection Regulations such as access to and rectification or erasure of personal data or the exercise of the right to object,



Combo Therapy (the Controller) is obliged to respond to requests without undue delay and at the latest within ***one month*** and if Combo Therapy failed to comply with your requests, Combo Therapy must give you reasons why.

Mechanisms for the right to request from the controller, access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability are available through Combo Therapy.

### **How a Data Subjects may verify the accuracy or request to amend their personal data?**

A data subject may verify that their personal data submitted to Combo Therapy is accurate by double checking their data that they entered before submitting the details to Combo Therapy. In the event of any inaccuracy being discovered in any e-mails or other communications the data subject may send an e-mail to Combo Therapy at [combotherapy.com](mailto:combotherapy.com) informing us of the inaccuracy and the relevant corrections required. Combo Therapy will rectify any inaccurate data highlighted.

### **How to exercise your data subject rights?**

Similarly, if a data subject wishes to request their personal data to be deleted, or wishes to request the portability of their personal data or to access their personal data, withdraw their consent to the processing of same, the data subject may e-mail Combo Therapy at [combotherapy.com](mailto:combotherapy.com) and request it. However, the data subject should note that the personal data that is processed under 'legal obligation' cannot be deleted until the required period of retention has expired, which is listed in the attached appendix. Regarding the consent withdraw, if the data subject consented to more than one form of processing, the data subject should clarify if the withdrawal is in respect of all processing of their personal data or in respect of one or more purposes of processing their personal data.

The controller is obliged to respond to a data subject request without undue delay and in any event within ***one month*** and where the controller does not comply with the request the controller is required to give reasons for such non-compliance.

### **Right of Data Subject to lodge a complaint with the Supervisory Authority**

The data subject has the right to lodge a complaint with the supervisory if he or she feel that any of their rights under the General Data Protection Regulations have been infringed and the data subject also has a right to seek judicial remedy to any such infringement.

### **The Data Commissioner in Ireland may be contacted by**

Telephone	<b>+353 57 8684800 +353 (0)761 104 800</b>
Fax	<b>+353 57 868 4757</b>
E-mail	<a href="mailto:info@dataprotection.ie">info@dataprotection.ie</a>

**Postal Address**                      **Data Protection Commission Canal House Station Road  
Portarlington R32 AP23 Co. Laois.  
Dublin Office 21 Fitzwilliam Square Dublin 2 D02 RD28 Ireland.**

## **Security of Personal Data**

Combo Therapy endeavour to hold all personal data securely in accordance with our internal security procedures and applicable laws. Combo Therapy will encrypt all personal data received through ProtectorApp, a file organisation and encryption program, as applicable to ensure the protection of your personal data and to prevent any unauthorised access to your personal data or the unauthorised use of your personal data.

Unfortunately, no data transmission over the Internet or any other network can be guaranteed as 100% secure. As a result, while we strive to protect your personal data, we cannot ensure and do not warrant the security of any information you transmit to us, and this information is transmitted at your own risk.

## **Risks & Safeguard**

The greatest risk to personal data is that of unlawful access. Combo Therapy has addressed and mitigated such potential risk by the implementation of technical and organisational measures to protect personal data it processes.

## **Rules in relation to the processing of personal data**

The terms and conditions in relation to the processing of personal data are set out in the implemented GDPR Policies and procedures designed to protect personal data during it processing by Combo Therapy.

## **Contact Details of Combo Therapy**

**Telephone:**                      (086) 3338886  
**Postal Address:**                33, Boru Court, Grange Road, Ballina, Co. Tipperary  
**Email:**                              combotherapy.com  
**Website:**                         [www.combo-therapy.com](http://www.combo-therapy.com)

If you wish to request any information about your personal data or believe that we are holding incorrect personal data on you, please contact [combotherapy.com](http://combotherapy.com).

## **Provision of the contents of Privacy Notice Orally**

If a data subject wishes to receive the information contained in this privacy notice orally, this will be provided by sending an e-mail to [combotherapy.com](mailto:combotherapy.com) requesting same and providing a contact phone number and a suitable time for the delivery of the information contained within this document to the intended recipient or by phoning the business on (086) 3338886 and request same. Arrangements will then be made for a member of Combo Therapy to phone the intended recipient and provide all the contents of Combo Therapy Privacy Notice to him or her orally and we will also ascertain that the recipient understands

the information that has been provided to them.

## Browsing our Website

Every time you connect to our website, our Cookies operate as outlined hereunder in the list of cookies used by our business. The purpose of cookies is to help us to understand which areas of the website are of particular interest, which pages are not being requested, and how many people are visiting the website in total etc. They also help us to determine which product and services may be of specific interest to visitors.

## Cookies

Combo Therapy use Cookies<sup>1</sup> for the purpose of improving the user's online experience. Cookies can be used to analyse user activity in order to improve the site, to look at aggregate patterns, like the average number of pages clicks that users perform so as to identify the information that is most sought-after. Cookies can also be used to analyse and gain insights about how to improve the functionality and user experience of the website.

The Cookies we use on our website are listed hereunder:

Cookies	Domain Name	Purpose
No Cookies used by Combo Therapy on their website	Non-Applicable	Non-Applicable

## Managing cookies in your browser

Use the tools and options in your web browser if you do not wish to receive a cookie. You can easily delete and manage cookies that have been installed in the cookie folder of your browser by following the instructions provided by your particular browser manufacturer. You may also consult your mobile device documentation for information on how to disable cookies on your mobile device.

To learn more about cookies you can visit <http://www.allaboutcookies.org/> which has a comprehensive guide on cookies and on how to restrict / delete them for most common browsers.

## Third party Websites and Links

Please note that you may have cookies placed on your computer by third parties' websites

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<sup>1</sup> A cookie is a piece of text that gets entered into the memory of your browser by a website, allowing the website to store information on your machine and later retrieve it. Cookies can also enable the tracking and targeting of the interests of users to enhance the onsite experience.

that refer you to our website. Please review the privacy policies of each of their websites you visit to better understand their privacy practices. We would like to inform you that anytime you click on links (including advertising banners), which take you to third party websites, you will be subject to the third parties 'privacy policies'.

While our website may contain links to other sites operated by third parties, we do not control such other sites and are not responsible for their content, their privacy policies or their use of personal data including any personal or financial information collected by third party's payment processors to process payments in relation our business. Our inclusion of such links does not imply any endorsement of the content of such sites or of their owners or operators except as stated on our website. Any information submitted by you directly to these third parties is subject to that third party's privacy policy.

### **Automated Decision Making (Profiling)**

No Data Profiling occurs during the processing of personal or special category of data by the Combo Therapy.

Under the GDPR you have the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affecting you, however, this shall not apply if a decision is necessary for entering into or performance of a contract between you and the data controller, or is authorised by European Union or Member State law or where you have given explicit consent for such processing.

If your personal data was subjected to automated decision-making, including profiling you are entitled to be notified of the existence of such processing and information about the logic involved as well as any significance and the envisaged consequences of such processing for you.

### **Account management**

Combo Therapy may use your contact details

- i. providing account management,
- ii. maintaining our business accounts and records.

### **Market research and surveys**

Combo Therapy Does not engage in market research or surveys

### **Marketing and Promotions**

When we engage in marketing or promotions, we may contact you from time to time in order to provide you with information about services and business-related activities that may be of interest to you.

All marketing emails that we send to you will follow the email guidelines described below. You have the right to ask us not to process your personal data for marketing or information purposes by clicking the unsubscribe option at the bottom of marketing or promotions e-mails.

## **Email communications**

Combo Therapy adhere to the following guidelines in relation to our email communications:

- emails will clearly identify us as the sender.
- emails sent to you for marketing purposes (if consented to receiving them) will include an option to unsubscribe from future email messages.
- you may unsubscribe from our mailing lists, with the exception of any emails regarding legal notices, or invoicing.
- any third parties who send emails on our behalf will be required to comply with legislative requirements on unsolicited emails and the use of personal data.
- We send emails from our email addresses at: [combotherapy.com](mailto:combotherapy.com)

If you receive an email which claims to come from us but does not, use this domain, or if you are suspicious that an email may not be approved by us, then please send a copy of the email to [combotherapy.com](mailto:combotherapy.com) so we can investigate.

## **Links**

This Privacy Notice applies to personal data collected by Combo Therapy. If an email or website contains links to a third-party site, please be aware that we are not responsible for the content or privacy practices of such site. We encourage our users to be aware when they leave our Site, and to read the Privacy Notice of other sites that collect personal data.

## **Notification of changes**

We reserve the right to amend or vary this Privacy Notice at any time and the revised Notice will apply from the date posted on the website. Combo Therapy will provide a link to our Privacy Notice on all electronic correspondences in order to keep you abreast of the contents of this Notice. Data Subjects will be notified of the changes made.

## **Reviews of Combo Therapy compliance with the GDPR**

Reviews of Combo Therapy compliance with the General Data Protection Regulations and Data Protection Acts will be conducted yearly.

**Appendix “A”**

**Customer’s Personal and Special Category Data and Purpose of Processing**

Category	Personal (P) / Special (S)	Purpose of Processing of Data	Duration of Retention of Data	Lawful Basis of Processing Personal Data
Name	P	Identification of customer and revenue regulations requirements	Retained for current year plus six years as required by Revenue Regulations.	‘Contract’
Address	P	Identification and communication Purposes and revenue regulations requirements	Retained for current year plus six years as required by Revenue Regulations.	‘Contract’
Phone Number	P	Communication Purposes in relation to business transaction(s)	Retained for period of business relationship and two years after last transaction with customer	‘Contract’
E-mail Address	P	Communication Purposes in relation to business transaction(s)	Retained for period of business relationship and two years after last transaction with customer	‘Contract’
Details concerning state of health / traumatic experiences.	S	Processed for the purpose of provision of therapy to client.	Retained for period of 5 years as required by Insurance Company.	‘Contract’

**Appendix “B”**

**Employee’s Personal and Special Category Data and Purpose of Processing**

Category	Personal(P) / Special (S)	Purpose of Processing	Duration of Retention of Data	Lawful Basis for Processing Personal Data

**Appendix “C”**

**Creditor’s Personal and Special Category Data and Purpose of Processing**

Category	Personal(P) / Special (S)	Purpose of Processing	Duration of Retention of Data	Lawful Basis for Processing Personal Data
Creditor’s Name & Address	P	Processed for the purpose of administration and management of the business’s financial affairs, payment of invoices, keeping of accounts, audits and in accordance with Revenue regulations.	Processed for the purpose of administration and management of the business’s financial affairs, payment of invoices, keeping of accounts, audits and in accordance with Revenue regulations.	“Legal Obligation’
Creditor’s Contact Details	P	Processed for the purpose of administration and management of the business’s financial affairs, payment of invoices, keeping of accounts, audits and in accordance with Revenue regulations.	Processed for the purpose of administration and management of the business’s financial affairs, payment of invoices, keeping of accounts, audits and in accordance with Revenue regulations.	“Legal Obligation’

**Covid-19 Personal and Special Category Data and Purpose of Processing**

Category	Personal(P) / Special (S)	Purpose of Processing	Duration of Retention of Data	Lawful Basis for Processing Personal Data
Name	P	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.	Record to be retained for 4 weeks.	Article 9(2)(i) of the GDPR, Section 53 of the Data Protection Act 2018, Safety, Health and Welfare at work Act 2005 (as amended) in respect of the Covid-19 Pandemic.
Address	P	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.	Record to be retained for 4 weeks.	Article 9(2)(i) of the GDPR, Section 53 of the Data Protection Act 2018, Safety, Health and Welfare at work Act 2005 (as amended) in respect of the Covid-19 Pandemic.
Details of Attendance (date, times) and any contact tracing related details.	P	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.	Record to be retained for 4 weeks.	Article 9(2)(i) of the GDPR, Section 53 of the Data Protection Act 2018, Safety, Health and Welfare at work Act 2005 (as amended) in respect of the Covid-19 Pandemic.
Telephone number	P	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.	Record to be retained for 4 weeks.	Article 9(2)(i) of the GDPR, Section 53 of the Data Protection Act 2018, Safety, Health and Welfare at work Act 2005 (as amended) in respect of the Covid-19 Pandemic.



Health Information or concerns re symptoms or diagnosis of Covid-19 virus	S	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.	Record to be retained for 4 weeks.	Article 9(2)(i) of the GDPR, Section 53 of the Data Protection Act 2018, Safety, Health and Welfare at work Act 2005 (as amended) in respect of the Covid-19 Pandemic.
Details of any close contact of a confirmed or suspected case of Covid-19	S	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.	Record to be retained for 4 weeks.	Article 9(2)(i) of the GDPR, Section 53 of the Data Protection Act 2018, Safety, Health and Welfare at work Act 2005 (as amended) in respect of the Covid-19 Pandemic.
If advised by Dr to Cocoon	S	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.	Record to be retained for 4 weeks.	Article 9(2)(i) of the GDPR, Section 53 of the Data Protection Act 2018, Safety, Health and Welfare at work Act 2005 (as amended) in respect of the Covid-19 Pandemic.
If advised by Dr to self-isolate	S	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.	Record to be retained for 4 weeks.	Article 9(2)(i) of the GDPR, Section 53 of the Data Protection Act 2018, Safety, Health and Welfare at work Act 2005 (as amended) in respect of the Covid-19 Pandemic.
Position of Employment	P	This information is processed in relation to the provision of healthcare and the management of public health	Record to be retained for 4 weeks.	Article 9(2)(i) of the GDPR, Section 53 of the Data Protection Act 2018, Safety, Health and Welfare at work Act 2005 (as amended) in respect

		issues in relation to the Covid-19 Pandemic.		of the Covid-19 Pandemic.
Confirmation of completion of Return to Work induction Covid-19 training	P	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.	Record to be retained for 4 weeks.	Article 9(2)(i) of the GDPR, Section 53 of the Data Protection Act 2018, Safety, Health and Welfare at work Act 2005 (as amended) in respect of the Covid-19 Pandemic.
Travel Details	P	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.	Record to be retained for 4 weeks.	Article 9(2)(i) of the GDPR, Section 53 of the Data Protection Act 2018, Safety, Health and Welfare at work Act 2005 (as amended) in respect of the Covid-19 Pandemic.
Signature of Person	P	This information is processed in relation to the provision of healthcare and the management of public health issues in relation to the Covid-19 Pandemic.	Record to be retained for 4 weeks.	Article 9(2)(i) of the GDPR, Section 53 of the Data Protection Act 2018, Safety, Health and Welfare at work Act 2005 (as amended) in respect of the Covid-19 Pandemic.