

Contents

1. Introduction.....	2
2. Who we are	2
3. Companies and websites within scope	2
4. Collection of personal data	3
5. Lawful basis for the processing of personal data.....	3
6. Storage of personal data.....	7
7. Security measures.....	7
8. Your rights as a data subject.....	8
9. Contact us.....	9
10. Complaints.....	9

1. Introduction

We appreciate the trust you place in us when sharing your personal data. The security of that data is very important to us. In this document, we will explain how we collect, use and protect your personal data.

We will also explain what rights you have with regards to your personal data and how you can exercise those rights.

2. Who we are

Mannings Construction Limited Group is the parent company for a number of organisations, such as J. Manning & Son (Dublin) Ltd. and Mannings Northern Ltd.

Mannings Construction Limited Group is the data controller for all the organisations within the group. This means that Mannings Construction Limited Group determines what data is collected by each organisation within the group, how this data is going to be used and how this data is protected.

Our registered office address is:

Mannings Construction Limited Group

138 University Street,
Belfast,
Northern Ireland,
BT7 1HJ.

If you have questions about how we process personal data, or would like to exercise your data subject rights, please email us at privacy@manning.ie.

3. Companies and websites within scope

The following companies and websites are within scope for this privacy policy:

Mannings Construction Limited	www.manning.ie
J. Manning & Son (Dublin) Limited	www.manning.ie
Mannings Northern Limited	www.manning.ie

We consider these websites EU-based websites; see section 6 below for more information on non-EU data processing.

It includes personal data that is collected through our websites or through email applications.

4. Collection of personal data

We collect personal data from you for one or more of the following purposes:

1. To provide you with information that you have requested or that we think may be relevant to a subject in which you have demonstrated an interest.
2. To initiate and complete commercial transactions with you, or the entity that you represent, for the purchase of products and/or services.
3. To fulfil a contract that we have entered into with you or with the entity that you represent. In these circumstances it may be your entity, rather than yourself, that has provided us with your personal data.
4. To ensure the security and safe operation of our websites and underlying business infrastructure.
5. To manage any communication between you and us.

The table in section 5 below provides more detail about the data that we collect for each of these purposes, the lawful basis for doing so, and the period for which we will retain each type of data.

Technical information

In addition, to ensure that each visitor to any of our websites can use and navigate the site effectively, we collect the following:

- Technical information, including the IP (Internet Protocol) address used to connect your device to the Internet.
- Your login information, browser type and version, time zone setting, browser plug-in types and versions.
- Operating system and platform.
- Information about your visit, including the URL (Uniform Resource Locators) clickstream to, through, and from our site.

Our cookies policy, which can be viewed from the home page of each of our web sites, describes in detail how we use cookies.

In section 8 below, we identify your rights in respect of the personal data that we collect and describe how you can exercise those rights.

5. Lawful basis for the processing of personal data

The table below describes the various forms of personal data we collect and the lawful basis for processing this data. Our business architecture, accounting and systems infrastructure and compliance organisation means that all personal data is processed on common, group-wide platforms. We have processes in place to make sure that only those people in our organisation who need to access your data can do so. A number of data elements are collected for multiple purposes, as the table below shows. Some data may be shared with third parties; where this happens, this is also identified below.

When we process on the lawful basis of legitimate interest, we apply the following test to determine whether it is appropriate:

The purpose test – is there a legitimate interest behind the processing?

Necessity test – is the processing necessary for that purpose?

Balancing test – is the legitimate interest overridden, or not, by the individual’s interests, rights or freedoms?

Purpose of collection	Information category	Data collected	Purpose for collection	Lawful basis for processing	Data shared with?	Retention period
1. To provide you with information	Subject matter information	Name, company name, geographic location, email address, business sector.	To provide appropriate online or email information about products and services that you have requested	Contractual fulfilment	Internally only	Maximum eight years from the date the information is collected. Six months if a marketing email is left unopened
			To provide further, related, online or email information and ongoing news updates in relation to the identified area of interest.	Legitimate interest	Internally only	
		Telephone number.	Follow-up to ensure requested information meets needs and identify further requirements.	Legitimate interest	Internally only	
		Personal contact information as provided through website forms or at trade shows or any other means.	General mailing list subscription.	Consent	Internally only	
2. Transactional information	Transaction details	Name, physical	To process purchase	Contractual performance	Internally only	Maximum eight years

		address, email address, telephone number, bank account details (for credit accounts), other medium of content delivery.	transactions for products and services with customers, and to ensure any transaction issues can be dealt with.			from the date of the performance of the contract.
			For accounting and taxation purposes	Statutory obligation	Internally and professional advisers	Six months from the date the data subject has input personal information but has not proceeded with a transaction.
			Documentation should any contractual legal claim arise.	Legitimate Interest	Internally and professional advisers	Eight years for VAT records from the performance of the contract
	Payment card data	Primary account number (PAN), cardholder name, service code, expiration date	To fulfil purchase requests using payment cards.	Contractual performance	Payment card companies, all in line with the PCI DSS	Only retained while authorisation is pending.
3. Fulfilment information	Fulfilment data	Name, dietary requirements.	Appropriate catering arrangements for training courses.	Contractual performance	Internally and training venues	Maximum six years from the date of the performance of the contract.
		Name, contact and identification details.	Access to training courses, attendance registers.	Contractual performance	Internally and training venues	
		Name, contact and identification details.	Exam attendance, exam results and certifications.	Contractual performance	Internally and external examiners, proctors and	

					certification bodies	
		Name, contact details.	Licensing details necessary for allocation and maintenance of a licence purchased for use of software and related products, distance and e-learning.	Contractual performance	Internally and any third parties whose products or services you may have purchased from us.	
		Name, address(es), email address, contact details.	Actual delivery of products or services, in physical or digital form, that you may have purchased from us.	Contractual performance	Internally and any third party logistics or supplier companies with whom we contract in order to fulfil these requirements.	
4. Security	Security information	Technical information, as described above, plus any other information that may be required for this purpose.	To protect our websites and infrastructure from cyber attack or other threats and to report and deal with any illegal acts.	Legitimate interest	Internally, forensic and other organisations with which we might contract for this purpose.	Relevant statutes of limitation.
5. Communications	Contact information	Names, contact details, identification details.	To communicate with you about any issue that you raise with us or which follows from an interaction between us.	Legitimate interest	Internally and, as necessary, with professional advisers.	Relevant statutes of limitation.
6. Product development	Survey data	Names, contact details, identification details.	To develop existing and new products that meet the expectations	Consent	Internally and where additional consent is given for	If anonymised for statistical research, this data may be

			and requirement of our customers.		marketing purposes.	kept indefinitely. Where not anonymised, it shall be retained for a maximum of one year.
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6. Storage of personal data

Mannings Construction Limited Group is a UK-registered organisation with offices are in the UK and ROI.

- The majority of our websites and web applications are hosted in the EU and are accessed only by our EU-based staff.
- Our website, as identified in section 2 above, are targeted at EU and non-EU customers and are accessed by staff located outside the EU. In all these instances, we have appropriate contractual and security measures in place to ensure that personal data is protected.
- Our customer relationship management, marketing and accounting systems for all our businesses are EU-based.
- We use a wide range of CSPs (Cloud service providers) as part of our processing environment. Unless we specifically state otherwise, we are, in respect of all these CSPs, the data controller.
- Unless we specifically state otherwise, all the CSPs that we use utilise EU-located processing facilities.
- Our payment processors and banking arrangements are based in the EU and, for our US website, in the US.
- We ship physical products around the world; we therefore use logistics companies that are based outside the EU and operate in other countries. We have appropriate legal and security relationships with those partners.
- We resell products supplied by organisations outside the EU. This may mean that our resale partner will have access to information about data subjects who purchase their products.
- We operate a data retention policy in respect of all data, whether paper-based or digital, and those aspects of it that relate to personal data are contained in the table at 5, above.

7. Security measures

Our ISMS (information security management system) is certified to ISO/IEC 27001. Our UK business is also Cyber Essentials Plus certified and all our payment card processing is in compliance with the PCI DSS (Payment Card Industry Data Security Standard).

We have what we believe are appropriate security controls in place to protect personal data. Risk assessment, including assessing risks to the rights and freedoms of data subjects, is at the heart of our ISMS. We do not, however, have any control over what happens between your device and the boundary of our information infrastructure. You should be aware of the many information security risks that exist and take appropriate steps to safeguard your own information. We accept no liability in respect of breaches that occur beyond our sphere of control.

8. Your rights as a data subject

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email privacy@manning.ie or use the information supplied in the Contact us section below. To process your request, we will ask you to provide two valid forms of identification for verification purposes. Your rights are as follows:

- **The right to be informed**

As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy policy and any related communications we may send you.

- **The right of access**

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients to whom the personal data has been disclosed
- d) The retention period or envisioned retention period for that personal data
- e) When personal data has been collected from a third party, the source of the personal data

- If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.

- **The right to rectification**

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

- **The right to erasure (the 'right to be forgotten')**

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.

- **The right to restrict processing**

You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:

- a) The accuracy of the personal data is contested.
- b) Processing of the personal data is unlawful.
- c) We no longer need the personal data for processing but the personal data is required for part of a legal process.
- d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing.

- **The right to data portability**

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

- **The right to object**

You have the right to object to our processing of your data where

- Processing is based on legitimate interest;
- Processing is for the purpose of direct marketing;
- Processing is for the purposes of scientific or historic research; or
- Processing involves automated decision-making and profiling.

9. Contact us

Any comments, questions or suggestions about this privacy policy or our handling of your personal data should be emailed to privacy@manning.ie

Alternatively, you can contact us at our global HQ using the following postal address or telephone numbers:

GDPR Compliance Manager,
Manning Construction Limited Group,
Unit 9, Cookstown Industrial Estate,
Tallaght,
Dublin 24.

Telephone: +353 (0) 466 5555

Our telephone switchboard is open 9:00 am – 5:00 pm GMT, Monday to Friday. Our switchboard team will take a message and ensure the appropriate person responds as soon as possible.

10. Complaints

Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you are entitled to escalate your complaint to a supervisory authority within the European Union.