
PRIVACY POLICY

BACKGROUND:

SWS Forestry understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, <https://swsforestry.ie> (“Our Site”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of Our Site;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 13, below;
[“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;]
“personal data”	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”); and
“We/Us/Our”	means SWS Forestry, a company registered in Ireland under number 459795, whose registered office is at West Cork Technology Park, Clonakilty, County Cork (“the Company”) regarding data protection and the rights of (“data subjects”) in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).

2. Information About Us

- 2.1 Our Site is owned and operated by SWS Forestry, a company registered in Ireland under number 459795, whose registered office is at **West Cork**

Technology Park, Clonakilty, County Cork (“the Company”) regarding data protection and the rights of (“data subjects”) in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).

2.2 Our Data Protection manager can be contacted by email at Henry.Duggan@swsforestry.ie, by telephone on **Freephone 1800 928 900**, or by post at the above address.

3. **What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. **What Is Personal Data?**

Personal data is defined by the GDPR as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers

5. **What are my rights?**

As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

- a) The right to be informed about Our collection and use of personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right of access to the personal data We hold about you (see Part 12);
- c) The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact us using the details in part 15);
- d) The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in Part 6 but if you would like Us to delete it sooner, please contact Us using the details in Part 15);
- e) The right to restrict (i.e. prevent) the processing of your personal data;
- f) The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- g) The right to object to Us using your personal data for particular purposes; and
- h) Rights with respect to automated decision making and profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

For further information about your rights, please contact the Data Commissioner’s Office or your local Citizens Advice office.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Data Protection Commissioner. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 15.

If We are unable to help, you also have the right to lodge a complaint with the Irish supervisory authority, the Data Commissioner's Office.

6. **What Data Do We Collect?**

Depending upon your use of Our Site, we may collect some or all of the following non-personal data (please also see Part 13 on Our use of Cookies and similar technologies and Our Cookie Policy):

- 6.1 IP address;
- 6.2 web browser type and version;
- 6.3 operating system;
- 6.4 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to;

7. **How Do We Use Your Data?**

- 7.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see Part 8, below.
- 7.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, or because it is in Our legitimate interests. Specifically, we may use your data for the following purposes:
 - a) Providing and managing your Account;
 - b) Providing and managing your access to Our Site;
 - c) Personalising and tailoring your experience on Our Site;
 - d) Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you);
 - e) Personalising and tailoring Our services for you;
 - f) Replying to emails from you;
- 7.3 With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email **AND/OR** telephone **AND/OR** text message **AND/OR** post with information, news and offers on Our **AND/OR** services allow for under Recital 47 of GDPR. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 7.4 Third parties (including Facebook and Twitter) whose content appears on Our Site may use third party Cookies, as detailed below in Part 13. Please refer to

Part 13 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.

- 7.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 7.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
- 7.6.1 Personal data is normally kept for 7 years following the end of our contract with you.

8. **How and Where Do You Store or Transfer My Personal Data?**

- 8.1 We only keep your personal data for as long as We need to in order to use it as described above in Part 7, and/or for as long as We have your permission to keep it.
- 8.2 Your data will only be stored in Ireland
- 8.3 The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:
- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
 - procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Data Protection Commission where we are legally required to do so;

9. **Do We Share Your Data?**

- 9.1 We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.
- 9.2 If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.
- 9.3 In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.
- 9.4 We may sometimes contract with the following third parties to supply certain products **AND/OR** services.

10. **How Can I Control My Personal Data?**

- 10.1 In addition to your rights under the GDPR, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details and by managing your Account).
- 10.2 You may also wish to sign up to one or more of the preference services operating in Ireland.

11. **Can I withhold information?**

- 11.1 You may access Our Site without providing any data at all.
- 11.2 You may restrict Our use of Cookies. For more information, see Part 13 and Our Cookie Policy.

12. **How Can I Access my Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our OR my progress.

13. **Our Use of Cookies**

- 13.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.
- 13.2 By using Our Site, you may also receive certain third-party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third Party Cookies are used on Our Site for web site traffic and Google analytics For more details, please refer to Part 6, above,

and to Part 13.5 below. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.

13.3 All Cookies used by and on Our Site are used in accordance with current Cookie Law.

13.4 Before Cookies are placed on your computer or device, you will be shown a consent menu requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

13.5 The following first party cookies may be placed on your computer or device:

14. Name of Cookie	Purpose	Strictly Necessary
devicePixelRatio	Used to make the site responsive to the visitor's screen size.	No
wordpress_test_cookie	Tests that the browser accepts cookies.	No
_ga	Google Analytics - Used to distinguish users.	No
gat<property-id>	Google Analytics - Used to throttle request rate.	No
_gid	Google Analytics - Used to distinguish users.	No
tk_ai	Jetpack - Stores the unique identifier for the publisher to enable Jetpack to collect data.	No
tk_lr	Jetpack - Stores the unique identifier for the publisher to enable Jetpack to collect data.	No
tk_or	Jetpack - Stores the unique identifier for the publisher to enable Jetpack to collect data.	No
wp-settings-{user_id}	Used to persist a user's wp-admin configuration.	Yes
wporg_logged_in wporg_sec	Used to check whether the current visitor is a logged-in WordPress.org user.	Yes
wporg_locale	Used to persist a user's locale configuration.	Yes

Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how Our Site is used. This, in turn, enables us to improve Our Site and the products **AND/OR** services offered through it.

The analytics service(s) used by Our Site use(s) Cookies to gather the required information. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable us to continually improve Our Site, making it a better and more useful experience for you.

The analytics service(s) used by Our Site use(s) the following Cookies:

Name of Cookie	Default expiration time	Provider	Purpose
_ga	2 years	Google	Used to distinguish users
_gid	24 hours	Google	Used to distinguish users.
ga<container-id>	2 years	Google	Used to persist session state.
_gac_gb_<container-id>	90 days	Google	ontains campaign related information. If you have linked your Google Analytics and Google Ads accounts, Google Ads website conversion tags will read this cookie unless you opt-out.

In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. **Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at Henry.Duggan@swsforestry.ie, by telephone on **Freephone 1800 928 900**, or by post at **West Cork Technology Park, Clonakilty, County Cork**. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under Part 12, above).

16. **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.