**KINGCADD**

**Privacy Notice**

This Privacy Notice is issued by the Kingspan Holdings (Ireland) Limited ofDublin Road, Kingscourt, Co Cavan (“**Kingspan**”, “**we**”, “**us**”, “**our**”).

The purpose of this notice is to inform you of the data relating to you that we collect and use in connection with your use of the KINGCADD Programme (the “**Programme**”) and the uses we make of such data.

If you have any questions about our use of your personal data, please contact **brian.glancy@kingspan.com**

**Personal Data that we Collect and Process**

We collect and process personal data relating to you in connection with your use of the Programme. This personal data may include:

* your name and contact details, including your address, phone number and email address;
* your log-in details to the Programme, including your username and password;
* where relevant, the name of the organisation you work for;
* where relevant, the name and contact details of your Kingspan representative;
* information about your use of the Programme including:
* your activity on the Programme, including but not limited to Project Names as set-up by you as well as document titles on which you are working;
* products being specified or included on Projects;
* modules of Plugins that you are using;
* details of the operating system on which you downloaded the Programme;
* in the event of any attempt to reverse engineer or to decompile the Programme, a screen grab of all open windows of your operating system;
* other technical information and usage data that does not personally identify you; and
* any other personal data relating to you that you provide to us or that we generate about you in connection with your use of the Programme.

**Purposes of Processing and Legal Basis**

We will use personal data relating to you for the purposes of:

* sending you an email invitation to download the Programme;
* installing the Programme on your device and registering you as a new Programme user;
* developing our products and services;
* managing our relationship with you, including notifying you of any changes to the Programme; and
* communicating with you about Kingspan activities, including sending you promotional and marketing materials, subject to any preferences that you may express when we collect your contact details or subsequently. You can opt out of receiving promotional and marketing materials from us at any time by contacting brian.glancy@kingspan.com

The legal basis on which we process your personal data is that you have given your consent to the processing. When you download the Programme, you will be asked to indicate your consent to our processing of your personal data as described in this Privacy Notice by clicking the ‘ACCEPT’ button.

**Recipients of Data**

We may disclose your personal data to other organisations in connection with the above purposes, including:

* to other members of our corporate group;
* to third parties who we engage to provide services to us in connection with the Programme, such as outsourced service providers, IT services providers, professional advisers and auditors;
* to other public authorities and bodies where required or permitted by law, such as the Gardaí or other law enforcement authorities for the purposes of the prevention, investigation or detection of crime.

**Transfers Abroad**

In connection with the above we might transfer your personal data outside the European Economic Area, including to a jurisdiction which is not recognised by the European Commission as providing for an equivalent level of protection for personal data as is provided for in the European Union. If and to the extent that we do so, we will ensure that appropriate measures are in place to comply with our obligations under applicable law governing such transfers. These may include entering into a contract governing the transfer that contains the ‘standard contractual clauses’ approved for this purpose by the European Commission or, in respect of transfers to the United States of America, ensuring that the transfer is covered by the EU-US Privacy Shield framework. If you would like to receive further details of the measures that we have taken in this regard, please contact brian.glancy@kingspan.com

**Retention**

We will not hold your personal data for longer than is necessary. We retain your personal data for as long as we need it for the purposes described in this Notice, or to comply with our obligations under applicable law and, if relevant, to deal with any claim or dispute that might arise between you and us.

**Requirement to Provide Personal Data**

You are not under a statutory or contractual obligation to provide us with any personal data, except where you download and use the Programme and we need it for this purpose. If you do not provide us with the information required, you may not be able to use the App.

**Your rights**

You have the following rights, in certain circumstances and subject to certain restrictions, in relation to your personal data:

* *Right to access the data* – You have the right to request a copy of the personal data that we hold about you, together with other information about our processing of that personal data;
* *Right to rectification* – You have the right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update the information such that it is complete;
* *Right to erasure* – You have the right to request us to delete personal data that we hold about you. This is sometimes referred to as the right to be forgotten;
* *Right to restriction of processing* – You have the right to request that we no longer process your personal data for particular purposes*;*
* *Right to data portability* – You have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, commonly used machine readable format; and
* *Right to withdraw your consent* – You have the right to withdraw your consent to the processing of your personal data at any time.

If you wish to exercise any of the rights set out above, please contact **brian.glancy@kingspan.com**

**Updates**

We may occasionally update this policy. We encourage you to periodically review this policy for the latest information on our privacy practices.

**Complaints**

If you are not happy with the way we are using your personal data or how we facilitate your rights or comply with our obligations under applicable data protection law, you have the right to make a complaint to the Data Protection Commission.

Details of how to lodge a complaint can be found at (https://www.dataprotection.ie/docs/Contact-us/11.htm) or you can call the Data Protection Commission at 353 (0)761 104 800.