



PRIVACY POLICY

Introduction

Barina Property Group including all holding companies and subsidiaries (“us”, “we” or “our”) is a construction business.

We are committed to protecting and respecting your privacy and our use of your personal information is governed by this Privacy Notice. This Policy explains how we, as the data controller, collect, use, process, and disclose your information, including personal information collected on our website www.barina.ie (the “**Site**”) and how we keep it secure. This policy does not apply to third-party websites, products, or services, even if they link to our services or Site, and you should consider the privacy practices of those third-parties carefully.

Who we are and what we do.

We are in the business of building new homes and providing associated services to our customers. In doing so we process personal data to enable the best possible service to you.

Our commitment to privacy and protecting your personal data

This privacy policy describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights. At all times we act responsibly keeping your personal data secure and confidential.

Personal information we gather in normal course of service

Personal information is any information about an individual from which that person can be identified (“**Personal Information**” or “**Personal Data**”). This could include information such as name, contact details or any information about your needs or circumstances which would allow us to identify you.

We obtain personal data about you from various sources in order to provide our services and to manage our Site. “You” may be a visitor to our Site, a user of one or more of our services (“**User**”), or a customer/member of a User (“**Customer**”). If you are a Customer of a User, we will generally not collect your Personal Data directly from you. Your agreement with the relevant User should explain how the User shares your Personal Data with us, and if you have questions about this sharing, then you should direct those questions to the User.

We generally collect Personal Information about you when you visit our Site or view our online content or interact with us online. We may also collect it from you when you engage with us either directly or through third party suppliers.

We process these details where relevant about customers; name, age, contact details, financial details and any other information supplied by you during the course of purchasing your new home or the letting / management of your home, that enables us to carry out our services for you.

Collection of information

We, whether directly or through third party suppliers, use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - request marketing to be sent to you; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies, in accordance with our [Cookie Policy](#).
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
 - Identity and Contact Data from publicly available sources such as the Companies Registration Office and the Revenue Commissioners.

Our legal bases for this processing are (i) where we need to comply with a legal obligation (ii) the fact it is necessary for the performance of a contract with you, (iii) the fact that we have legitimate interests in the processing, or (iv) the consent you may have provided.

Why we process your personal data

Our use of personal data may vary depending on the service provided, however it can include the following:

- To fulfil our obligations to you and to undertake other services on your behalf, including processing personal data to deliver an excellent service to our customers.
- To provide the relevant service or feature that you have requested and to manage your preferences.
- To gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our Site, newsletters and interactions. You will have the right to unsubscribe from any repeat communications at any time.
- To send you communications which you have requested and that may be of interest to you.
- To notify you of changes to our services or policies.
- To seek your views or comments on the services we provide.
- To respond to your requests for information and other communication or correspondence you may submit to us.
- To allow you to participate in interactive features of our Site, when you choose to do so.
- To investigate any improper use of our products, services or the network.

How long do we keep your data?

The period for which we will keep your personal information will depend on the type of service you have requested from us. In general, we will not retain your personal information for a period longer than is necessary for that purpose which it was collected, however the retention period may be longer than the period for which we are providing services to you where we have statutory or regulatory obligations to retain personal information for a longer period, or where we may need to retain the information in case of a legal claim.

Monitoring

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training and compliance. These recordings are held for a limited period only.

Sharing and Disclosure

We consider your data to be private and confidential. We may sometimes disclose your Personal Data to agents or other third party service providers appointed by us (including to deal with customer service issues regarding defects / outstanding works / maintenance), IT Systems providers, to regulatory bodies or to others who work for us in connection with the provision of products and/or services to you. We may also disclose information as part of any criminal investigation or to prevent fraud.

We may access and/or disclose your Personal Data if required to do so by law or in good faith and belief that such action is necessary to: (a) conform with the law or comply with legal process served on us; (b) protect and defend our rights, without limitation the security and integrity of our network and systems; or (c) act under exigent circumstances to protect the personal safety of customers, users of our services or members of the public. In the event that we sell or buy businesses or assets, we may disclose your Personal Data to the prospective seller or buyer of such business or assets.

Security of your personal data

We take our data security responsibilities seriously, employing appropriate physical and technical measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

The majority of our data is held on our secure servers and in cloud based systems. Our physical files are stored in our offices and our archives.

Access to data is achieved through laptops and mobile devices. Access is controlled via secure login to laptop and secure login to the cloud services. If a mobile device or laptop goes missing, we evaluate whether we should change all passwords for the device and cloud services.

It is important to note that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

Lawful basis of processing personal data.

Legitimate Interests

We rely on Article 6(1)(f) of GDPR, which provides that we can process personal data where processing "is necessary for the purposes of the legitimate interests pursued by us, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."

Performance of a contract with you

We will use your personal data where we need to perform the contract we are about to enter into or have entered into with you.

Necessary to comply with a legal obligation

We will use your personal data where we need to comply with a legal obligation.

Consent

Generally we do not rely on consent as a legal basis for processing your personal data, although there are circumstances where we will need your consent to process your data. We will always seek your

consent prior to issuing third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Your rights over the personal data we hold under law

To get in touch about your personal data, please contact us directly at customerservice@barina.ie. We will deal with your request within 30 days.

Right to object: If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases).

Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities or consent to market to you, you may withdraw your consent at any time.

Data Subject Access Requests (DSAR): You have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information. At this point we may comply with your request or, additionally do one of the following:

- we may ask you to verify your identity, or ask for more information about your request; and
- where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.

Right to erasure: In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to “erase” your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

Right of data portability: If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.

If your interests or requirements change, you can unsubscribe from part or all of our marketing content (for example job role emails or newsletters) by clicking the unsubscribe link in the email. All requests should be addressed to customerservice@barina.ie

Contact

If you have any complaints about our services or the manner in which we hold your personal information, please contact customerservice@barina.ie or call +353 1 8215487. You also have the right to lodge a complaint with the Data Protection Commission, whose contact details can be found at www.gdprandyou.ie

Changes to this Privacy Policy

We will post changes to this Privacy Policy and indicate the effective date when this Privacy Policy is updated. If we make any material changes to this Privacy Policy, we will post notice of these changes on this site. You are advised to review this Policy periodically for any changes.

By accessing this website, you indicate your acceptance of this Privacy Policy.