



Innovative Technology – Its Who We Are

Data Protection & Privacy Notice for Security Systems

Fast Wireless Internet Ltd. Trading as ARRA collects and processes data that is covered by the EU GDPR (EU General Data Protection Regulations) which strengthens the rights of individuals regarding their personal data and seeks to unify local data protection laws across Europe.

The purpose of this document is to inform our customers, clients, and users about what data we collect on them, and how this data is processed.

If you are unsure of what data we have collected on you, or wish to see our records on you, or are unsure of any aspect of our processing, please contact us using one of the methods below.

Via Mail:

ARRA
Boru House,
Ballina,
Killaloe P/O
Co. Tipperary
V94 DT3C

Via Phone: 061 514 513 (INTL: +353 (0)61 514 513)

Via Email: info@arra.ie

Data We Collect:

Data	Source
Full Name	Customer
Full Address / GPS / Eircode	Customer or via lookup at finder.eircode.ie
Telephone Number	Customer
Email Address	Customer
Premises Owner	Customer / Premises Owner
Bank Name and Address	Customer (via SEPA DD Mandate)
Bank Account Number / IBAN	Customer (via SEPA DD Mandate)
Swift BIC	Customer (via SEPA DD Mandate)
Business Name	Customer (if required)



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Data We Associate:

Data	Source
Account Number / Account ID	Internally Generated
HikConnect Details	Customer

How We Collect Data:

We typically ask for any details we require when you sign up for one of our products or services via phone, email or in person.

Basis for Processing Data:

The primary and principal purpose for processing customer data by ARRA is to meet our **Contractual Obligations** to the customer, i.e. managing orders, recording of service issues, etc...

In some instances, data may be processed outside of our contractual obligations to the customer in order to meet our **Legal or Regulatory Requirements**, such as compliance with PSA Regulations or for record-keeping and accounting.

In order to keep our customers up to date with our latest offerings, we may occasionally process customer data for marketing purposes (sending promotional emails, flyers etc...) however this may only happen with the customers express **consent**. Should a customer decide and any time to withdraw consent for this, they simply need to inform us using one of the methods listed above and we will update our records to indicate the customer no longer consents to data processing for marketing purposes.

Retention of Data:

ARRA will retain all customer data for the required periods defined by legal and regulatory bodies in Ireland.

In some circumstances, customer data will be removed from our live systems at the time of expiry of the retention period, however data may remain in archives for the purposes of Business Continuity and Disaster Recovery. This data will be overwritten at interval with updated backups while older backups will be cycled out and destroyed.

In the instance of physical paper records, ARRA may scan or otherwise digitize these documents prior to their shredding or physical destruction. In any case, the data itself will not be retained outside of required period except where necessary for archival purposes.



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Distribution of Data to Third Parties

For some data, we are required by our **Contractual Obligations** to share this data with third parties. An example of this is for payment processing via SEPA Direct Debit.

ARRA currently makes use of third-party customer relations software called Salesforce. This is required for us to meet our Contractual Obligation with relation to managing customer accounts, installations and incidents. The Salesforce GDPR statement is available at <https://www.salesforce.com/GDPR>.

ARRA also makes use of third-party productivity and communications software provided as the Microsoft 365 Suite from Microsoft. More information on how Microsoft processes and stores data is available at <https://www.microsoft.com/en-ie/trust-center>.

From time to time, we may share your data with additional third parties under the following circumstances:

- Organisations working on our behalf to provide you with products or services.
- If we believe your personal safety is at risk.
- If required by any relevant public authority or law enforcement agency.
- If there is a change in ownership of ARRA.
- If we believe you have provided false information which warrants additional investigation.
- Where a customer has made a complaint, which requires additional investigation.
- If a credit check is required.
- We may pass your data on to a third party if you fail to meet your contractual obligations.

Storage of and access to data:

All customer data is stored either, on local machines managed and administered by the ARRA ICT Department or on the Microsoft365 cloud-hosted platform, or on Salesforce. In any case, as with all data processed by ARRA, the principal of least privilege is applied in line with industry standards. That is to say, only staff who require access to customer data in order to conduct their duties is granted such access.

In the event of data being stored on local machines, removable media, portable devices etc... it is the ARRA ICT Policy for full disk encryption and encryption at rest to be applied to anything that may be considered personally identifying or sensitive.

Assignment of Data Controller Status:

ARRA – although a PSA Certified installer of CCTV and Security equipment, are not the data controllers for systems we have installed without prior written agreement between both ARRA and the customer. Without this written agreement in place, the customer shall be responsible for all regulatory compliance as a Data Controller for data which their system gathers.



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Your Rights under GDPR:

As a customer of ARRA, under the terms of the GDPR you are considered a “data subject” whilst ARRA is considered a “Data Controller”. The GDPR assigns several rights to a data subject within the regulations. These rights are listed below:

- **Right to be Informed:** We must inform you of what data is being collected, what this data is being used for, how long it will be retained by us and if this data is to be shared with any third parties. This document serves to inform you of this.
- **Right of Access:** At any stage, you have a right to request a copy of the information that we hold on you.
- **Right of Rectification:** At any stage, should you determine that the data we have stored on you is incorrect or out of date, you may inform us of this and we will rectify any incorrect data at your request.
- **Right to be Forgotten:** In certain circumstances, you can ask for the data we hold on you to be erased from our records. We cannot erase data for which we are required to store under legislation.
- **Right of Portability:** You can request we transfer any data we hold on to another company.
- **Right to Restrict Processing:** You can request that we limit the processing of your data, however we cannot restrict processing which is required in order to meet our contractual obligations, nor may we restrict the processing of data which we are required to do as a result of any legal requirements.
- **Right to Object:** You have the right to challenge certain types of processing, i.e. marketing.
- **Rights related to Automated Processing:** You have the right to request a review of any automated processing of your data if you believe the GDPR is not being applied appropriately.

How to Access Your Data:

If you would like to request a copy of your personal data, you can do so via email to accounts@arra.ie or by post to:

Data Protection Officer
ARRA
Boru House,
Ballina,
Killaloe P/O,
Co. Tipperary
V94 DT3C

Complaints:

If you believe we have processed, stored, accessed or acted upon data we have on you in violation of the GDPR, complaints can be addressed to the Data Protection Commissioner. More information on this is available at <http://www.dataprotection.ie>.