



## DATA PROTECTION POLICY

Ballycommon Rail Ltd is committed to ensuring the privacy and security of all personal data retained. The Director is committed to the delivery of this policy statement and ensuring it is understood and followed throughout the business. The Ballycommon Rail Ltd company structure facilitates transparent and compliant administration of the General Data Protection Regulations (GDPR), this includes assigning responsibilities for Data Protection to a specific individual within the structure of the organisation. This role has been assigned to the Director.

Through the implementation of defined processes and with a strong focus on managing risk, Ballycommon Rail Ltd communicate openly with internal and external customers on how their personal data is collected and stored. Ballycommon Rail Ltd only process personal data that is essential to business operations or our continued compliance with government and regulatory bodies where we are required to achieve certain operational, vocational and administrative standards. This may include the need to verify certain competencies or qualifications held by an individual which may be essential for them to carry out their work.

Personal data will be captured through completion of the Ballycommon Rail Ltd Application form. All employees will be required to complete the company Data Protection Consent Agreement this will identify exactly which elements of Personal data the company can hold on their behalf. All employees will have the right to refuse to allow the company to hold any of their Personal data as identified on the Data Protection Consent Agreement. Ballycommon Rail Ltd confirms to employees via this policy that no personal data will be passed to a third party without the express permission of the individual concerned. All personal data is stored in a password-protected database managed by the specific individual assigning responsibilities for Data Protection.

Through the continual monitoring of compliance with this policy, Ballycommon Rail Ltd regularly reviews the accuracy of personal data held and offers all individuals routine opportunities for review and updating of this information. The quality and accuracy of all personal data is a primary concern and upon reasonable request, all personal data that is being held, where/how it was obtained and who it may be shared with will be made available.

All individuals retain the right to complain to the Information Commissioners Office (ICO) should they feel there is a cause for concern regarding the manner in which their personal data is being managed or processed. In the first instance, all investigations will be carried out at a senior management level and be escalated to the Directors in the event that an acceptable resolution cannot be achieved.

Ballycommon Rail Ltd ensure that all consent mechanisms used in the consent process are unambiguous. Every opportunity is provided for the individual to assert a positive indication of agreement and that they have been afforded the opportunity to make a decision, rather than proceed on an assumption of acceptance by default.

Data security is of paramount importance to Ballycommon Rail Ltd as part of our protection from any data breaches systems are constantly monitored, audited and assessed to facilitate the detection of potential breaches. Any breaches deemed to be of a level that may involve suffering, financial loss or damage through identity theft or confidentiality breach will be notified to the ICO. Ballycommon Rail Ltd do not currently operate internationally. In the event that our business expands internationally this policy will be amended and distributed through the appropriate channels.

**Redmond Barry**  
**Managing Director**

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