



Privacy Policy

1. ABOUT THIS PRIVACY STATEMENT

- 1.1 Dawn Meats is a trading name of Dawn Meats Ireland Unlimited Company (Company registration number 135414) and references to “Dawn Meats” or “us” or “we” shall be interpreted as references to Dawn Meats Ireland Unlimited Company trading as Dawn Meats.
- 1.2 We envisage the following as being data subjects (and referred to as “you”) for the purposes of this Privacy Statement: farmers from whom we purchase livestock, individuals visiting our website, individuals contacting us by phone, post, email or through the contact form on our website, customers and suppliers who are sole traders with <€6m turnover, and persons submitting applications in the careers section of our website.
- 1.3 At Dawn Meats we are committed to protecting and respecting your privacy. We created this Privacy Notice as the controller of personal data necessary to conduct our business operations, to demonstrate our firm commitment to privacy and to inform you about the information we collect and process in connection with your business arrangement.
- 1.4 This Privacy Statement will let you know how we look after your personal data. It also informs you as to our obligations and your rights under data protection law. We take your privacy seriously and will only use your personal information to administer your account and to fulfil our contract with you. If you have any queries about this notice or about how your information is gathered, stored, shared or used please contact our GDPR Coordinator at GDPR@dawnmeats.com.
- 1.5 Click on the headings below to find out more about how we collect and process your personal data:
 - 1.5.1 [Who is responsible for your personal data?](#)
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Contact Details

1.6 Dawn Meats contact details are as follows:

Telephone	+ 353 51 309 200
Email	GDPR@dawnmeats.com
Post	Grannagh Business Park Grannagh Waterford X91 HRR3

2. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

- 2.1 Data protection provides rights to individuals with regard to the use of their personal information (personal data) by organisations, including Dawn Meats. Irish and EU laws on data protection govern all activities we engage in with regard to our collection, storage, handling, disclosure and other uses of personal data.
- 2.2 Compliance with the data protection rules is a legal obligation. In addition, our compliance with the data protection rules helps individuals to have confidence in dealing with us and helps us to maintain a positive reputation in relation to how we handle personal information.
- 2.3 The data protection rules that apply to us are currently contained in the Data Protection Acts 1988 and 2003, the Data Protection Act 2018, the ePrivacy Regulations 2011 and in related legislation (together the “**DPAs**”), and the EU General Data Protection Regulation (EU Regulation 679/2016) (the “**GDPR**”).
- 2.4 “**Data controllers**” are the people who or organisations which determine the purposes for which, and the manner in which, any personal data is processed, who/which make independent decisions in relation to the personal data and/or who/which otherwise control that personal data.
- 2.5 “**Data processors**” are the people who or organisations which process personal data on behalf of, and on the instructions of, a data controller.
- 2.6 For the purposes of the GDPR, Dawn Meats is the data controller with regard to the personal data described in this Privacy Statement other than in the context of collecting IFA levies from farmers where we act as a data processor for the IFA.

3. WHAT PERSONAL DATA AND SPECIAL CATEGORIES OF PERSONAL DATA DO WE COLLECT, HOW AND WHY?

- 3.1 “**Personal data**” means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;.



- 3.2 **Categories of Personal Data we collect.** We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:
- 3.2.1 **Identity Data** includes [first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender].
 - 3.2.2 **Farm Specific Data** includes herd number, flock number, CPH number, veterinarian details, feed supplier details, breed society registration details, assurance scheme details and agents details.
 - 3.2.3 **Contact Data** includes billing address, delivery address, email address, telephone numbers and fax numbers.
 - 3.2.4 **Financial Data** includes bank account and payment card details.
 - 3.2.5 **Other** details includes [previous arbitrations]
 - 3.2.6 **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
 - 3.2.7 **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
 - 3.2.8 **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
 - 3.2.9 **Usage Data** includes information about how you use our website, products and services.
 - 3.2.10 **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- 3.3 **“Special Category (Sensitive) Personal data”** are specific categories of personal data related to a person's profile: race or ethnicity; political, religious or philosophical beliefs; sexual life or sexual orientation; health; genetic or biometric data or trade union membership. There are additional requirements for the protection of sensitive personal data by organisations. The following are the instances where we may collect, use or store Special Category (Sensitive) Personal Data:
- 3.3.1 **Site security** includes [CCTV images of people on site; photos for use in promotional material on and offline.]
 - 3.3.2 **Others** might include [religious belief or ethnicity] - We do not specifically request information on religious belief or ethnicity but based on you providing information such as dietary requirements it may on occasion result in processing such information.

4. HOW WE COLLECT YOUR PERSONAL DATA:

- 4.1 We collect your personal data through the following means:
- 4.1.1 **Direct interactions.** You may give us your [Identity, Contact and Financial Data] in person, by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - (a) sell your livestock to us;



- (b) complete the opt-out form choosing not to have the IFA levy deducted from the purchase price of your livestock;
- (c) undertake business transactions with us [sole traders <€6m];
- (d) make a job application through the careers portal in our website;
- (e) request marketing information to be sent to you;
- (f) purchase products online; or
- (g) give us some feedback.

4.1.2 **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy [here](#) for further details.

4.1.3 **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

- (a) **Technical Data** from the following parties when you use our website:
 - (i) analytics providers [such as Google based outside the EU];
- (b) **Contact, Financial and Transaction Data** from hauliers or other intermediaries who may act as a go between in our transaction with you to purchase your livestock.
- (c) **Identity and Contact Data** from data brokers or aggregators such as Revenue Commissioners, Department of Agriculture Food and the Marine, Animal Identification and Movement data base, Irish Cattle Breeders Federation, Angus Society based inside the EU.
- (d) **Identity and Contact Data** from publicly available sources [such as [NAME]].

4.2 We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do **so**.

Purpose/Activity	Type of data	Lawful basis for processing
To manage our business contract and agreements (as pertains to sole traders of < €6m turnover)	(a) Identity Data (b) Contact Data (c) Financial Data	Necessary for the performance of our contract with you
To manage our purchases of livestock from you	(a) Identity Data (b) Contact Data (c) Financial Data	Necessary for the performance of our contract with you
To demonstrate compliance with	(a) Identity Data	(a) Necessary for our legitimate interests (for running our



traceability and food standard requirements through sharing appropriate supply chain and employee information	(b) Contact Data	business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
To support marketing of meat pertaining to specific locations or other 'marketable' traits (whether covered by PGI or not)	(a) Identity Data (b) Contact Data	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
To facilitate the collection of the IFA levies from eligible farmers and to record those farmers who opt out	(a) Identity Data (b) Contact Data (c) Financial Data	We act as processor for the IFA for this purpose and it is they who provide the lawful basis for processing. The IFA privacy statement can be found on their website here.
To enter you onto our mailing lists where you have requested to be added	(a) Identity (b) Contact (c) Marketing and Communications	Consent
To respond to you when you contact us through the contact form on our website or by phone, post or email	(a) Identity (b) Contact	Consent
To process applications forms from you when you apply for a job using the application forms in the careers portal on our website. The information will be used for the purposes of the recruitment process and for the purpose of possible employment within the group.	(a) Identity (b) Contact	Necessary for the purposes of entering into a contract with you.
To manage our relationship with you which will include: (a) Notifying you about changes to our terms and conditions or privacy policy (b) Asking you to provide	(a) Identity (b) Contact (c) Profile	Necessary for the performance of our contract with you



feedback or take a survey		
To comply with health and safety and animal welfare recording using CCTV	(a) Image	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To comply with legal obligations, pursue our legitimate interests and protect our legal position in the event of legal proceedings against the Company	(a) Identity (b) Contact (c) Financial Data (d) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)



5. INFORMATION ABOUT CONSENT

- 5.1 By consenting to our processing your personal data in line with this Privacy Statement you are giving us permission to process your personal data specifically for the purposes identified.
- 5.2 You may withdraw consent at any time by providing an unambiguous indication of your wishes by which you, by a statement or by a clear affirmative action, signify withdrawal of consent to the processing of personal data relating to you. If you have any queries relating to withdrawing your consent please contact our *GDPR Manager* whose details are set out below. You may withdraw your consent by [contacting us](#).
- 5.3 Withdrawal of consent shall be without prejudice to the lawfulness of processing based on consent before its withdrawal.

6. WHAT ARE THE DATA PROTECTION PRINCIPLES?

- 6.1 We must process personal data fairly, lawfully and transparently. This means that we must have a valid legal basis for our processing of personal data as set out under the DPAs or (when applicable) the GDPR. It also means that we must be transparent with individuals about our processing of their personal data ("**lawfulness, fairness and transparency**");
- 6.2 We can only collect personal data for specified, identified and legitimate purposes. We can only then process the personal data that we have collected for the purposes which we have identified or for purposes that are compatible with the purposes that we have identified ("**purpose limitation**");
- 6.3 The personal data that we collect and process must be adequate, relevant and limited to what is necessary for the purposes for which they are processed ("**data minimisation**");
- 6.4 The personal data that we collect and process must be accurate and (where necessary) kept up to-date ("**accuracy**");
- 6.5 We must not keep personal data any longer than is necessary, bearing in mind the purpose for which we collected it. This means that we should keep personal data in a form which permits identification of the data subject for no longer than is necessary ("**storage limitation**"); and
- 6.6 We must process personal data in a manner that ensures appropriate security of the personal data, including protection against unlawful or unauthorised processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ("**integrity and confidentiality**").

7. SECURITY OF YOUR PERSONAL DATA

- 7.1 We take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.
- 7.2 We have put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. Personal data will only be transferred to a data processor if they agree to comply with those procedures and policies, or if they put in place adequate measures themselves. In addition, we have appropriate written agreements in place with all of our data processors.
- 7.3 We maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows:
- 7.3.1 Confidentiality means that only people who are authorised to use the data can access it.



7.3.2 Integrity means that personal data should be accurate and suitable for the purpose for which it is processed.

7.3.3 Availability means that authorised users should be able to access the data if they need it for authorised purposes.

7.4 We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction or damage.

7.5 Any processing of personal data outside of the EEA shall comply with Chapter V of the GDPR

8. HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

8.1 Your personal data will be deleted when it is no longer reasonably required for the purposes described above or you withdraw your consent (where applicable) and we are not legally required or otherwise permitted to continue storing such data.

8.2 Where you ask to be unsubscribed from marketing communications we may keep a record of your email address and the fact that you have unsubscribed to ensure that you are not sent any further emails in the future.

8.3 Further details on how long we retain personal data are contained in our retention policy which you can request from us by contacting us.

9. WILL WE SHARE YOUR INFORMATION WITH ANYONE ELSE?

9.1 Your personal data may also be shared with the following third parties:

Third party	Reason for sharing data
The Irish Farming Association	We will share certain information with the IFA as a data processor for them in relation to the collection of the IFA levy and the recording of those farmers who opt out of having the levy deducted. We have entered into a data processing agreement with the IFA to ensure that such transfer and sharing happens in compliance with the DPAs and the GDPR.
Third party auditors, Bord Bia, DAFM, Customers	We will share certain information with the named third parties as part of audits we are subjected to, to demonstrate traceability, compliance, food safety, responsible business and other standards
Internal Third Parties	Other companies in the “Dawn Meats Group” (i.e. subsidiaries and/or holding companies of Dawn Meats who are based in Ireland and/or the EEA and provide IT and system administration services and undertake leadership reporting
External Third Parties	Service providers acting as processors based in Ireland and/or the EEA who provide IT and system administration services Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in Ireland and/or the EEA who provide consultancy, banking, legal, insurance and accounting



	<p>services to our business.</p> <p>Regulators and other authorities based Ireland and/or the EEA in circumstances where are required by law to process your personal data.</p> <p>During the course of the normal hiring process personal data of prospective employees may be shared. [in the norm it will be Dawn Meats receiving data]</p>
Successors of our business	<p>Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Statement</p>

- 9.2 Please note that the above list may be amended from time to time and this Privacy Statement will be amended to reflect these changes.
- 9.3 We require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line with Irish and EU laws on data protection. Any such company or individual will have access to personal information needed to perform these functions but may not use it for any other purpose.
- 9.4 Specifically, we need to have written agreements in place with all of our data processors.
- 9.5 We may pass on your details if we are under a duty to disclose or share a data subject's personal data in order to comply with any legal obligation.

10. YOUR DATA PROTECTION RIGHTS

- 10.1 Under certain circumstances, by law you have the right to:
- 10.1.1 **Request information** about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
 - 10.1.2 **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
 - 10.1.3 **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
 - 10.1.4 **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
 - 10.1.5 **Object to processing** of your personal information. You also have the right to object where we are processing your personal information for direct marketing purposes.
 - 10.1.6 **Object to automated decision-making** including profiling, that is not to be subject of any automated decision-making by us using your personal information or profiling of you.



10.1.7 **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

10.1.8 **Request transfer of your personal information** in an electronic and structured form to you or to another party (commonly known as a right to “**data portability**”). This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.

10.1.9 **To make a complaint to the data protection commissioner**

11. REQUESTS BY DATA SUBJECTS TO EXERCISE THEIR RIGHTS

11.1 If you have any questions about this policy or about our data protection compliance, please contact our GDPR Coordinator.

11.2 Data subjects must make a formal request for personal data we hold about them or otherwise to exercise their data protections rights whether to make an access request or otherwise by contacting our GDPR Coordinator.

11.3 Our GDPR Coordinator can be contacted as follows:-

Telephone	+353 51 309200
Email	GDPR@dawnmeats.com
Post	<i>GDPR Coordinator</i> Grannagh Business Park Grannagh Waterford X91 HRR3

11.4 Note also that data subjects have the right to complain at any time to a data protection supervisory authority in relation to any issues related to our processing of their personal data. As our organisation is located in Ireland and we conduct our data processing here, we are regulated for data protection purposes by the Irish Data Protection Commissioner. You can also contact the Data Protection Commissioner as follows:

11.4.1 Go to their website www.dataprotection.ie

11.4.2 Phone on +353 57 8684800 or +353 (0)761 104 800

11.4.3 Email info@dataprotection.ie

11.4.4 Address: Data Protection Office - Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23. Or 21 Fitzwilliam Square Dublin 2. D02 RD28 Ireland.

12. CHANGES TO THE PRIVACY STATEMENT

Our Privacy Statement may change from time to time and any changes to the statement will be posted on this page.