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# Privacy Policy

**Last updated:** 20<sup>th</sup> April 2026

## 1. Introduction

This Privacy Policy explains how Brazil & Co (Steel) Ltd (“we”, “our”, “us”) collects, uses, stores, and protects personal data when you interact with our business, visit our facilities, use our website ([www.fairyhousesteel.ie](http://www.fairyhousesteel.ie)) or engage our steel rebar services.

We are committed to complying with the **General Data Protection Regulation (GDPR)** and all applicable Irish and EU data-protection laws. We are committed to protecting your privacy.

## 2. Data We Collect

We may collect the following categories of personal data:

### A. Customer & Supplier Information

- Name, job title, company name
- Email address, phone number, billing details
- Project specifications that may include identifiable contact details
- Delivery addresses and site-access information
- Information necessary to make or receive payments

### B. Employee & Contractor Information

- Contact details and emergency contacts
- Time-and-attendance records (including clock-in/clock-out data)
- Training records, certifications, and safety compliance
- HR and payroll information
- Information necessary to make/receive payments
- CCTV footage for site security

### C. Website & Digital Data

- IP address, browser type, device information
- Contact form submissions
- Cookies and analytics data

### D. Facility & Security Data

- CCTV recordings
- Visitor logs
- Vehicle registration numbers for site access

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### 3. How We Use Your Data

We use personal data for:

- Processing orders, quotations, and deliveries
- Managing supplier relationships
- Fabricating and delivering steel reinforcement products
- Allowing customers to participate in interactive features of our Service should you choose to do so
- Ensuring workplace safety and regulatory compliance
- Managing employee payroll, HR, and scheduling
- Monitoring site security and preventing unauthorised access
- Maintaining accurate financial and operational records
- Improving our website and customer experience

We do **not** use personal data for automated decision-making or profiling.

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### 4. Legal Basis for Processing

We process personal data under the following GDPR bases:

- **Contractual necessity** – to fulfil orders and supply products including quoting, processing Purchase Orders, manufacturing order, processing payments, delivering, invoicing, accounting, auditing and support services including providing information within our portal, and providing information supporting traceability of our products.
- **Legal obligation** – health & safety, revenue compliance, employment law
- **Legitimate interests** – site security, operational efficiency including entering into Contractual relationship with your Company, supplying goods and services, managing the business relationship with Brazil & Co (Steel) Ltd including quoting, processing Purchase Orders, manufacturing orders, processing payments, delivering, invoicing, accounting, auditing and support services including providing information connected to Orders.
- **Consent** – for marketing communications (where applicable)

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### 5. How We Share Your Data

We may share data with:

- Logistics partners and delivery companies
- Other people within your Organisation
- Payment processors and financial institutions
- IT service providers, cloud storage, and email systems
- Telephone providers
- Health & safety consultants or auditors
- Government or regulatory authorities when legally required

We **never sell** personal data.

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## 6. Data Retention

In accordance with our Data Retention Policy, we shall keep the Personal Data we process for our clients for the necessity of complying with our legal, revenue and regulatory requirements.

Retention periods vary depending on the data type (e.g., CCTV typically 30–90 days unless required for investigation).

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## 7. Data Security

We implement technical and organisational measures to protect data, including:

- Secure servers and encrypted communications
- Access-controlled systems
- CCTV monitoring
- Staff training on data protection
- Regular security reviews

However, no method of transmission is 100% secure.

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## 8. Your Rights (GDPR)

You have the right to:

- Access your personal data
- Request correction or deletion
- Restrict or object to processing
- Request data portability
- Withdraw consent (where applicable)

To exercise these rights, contact us at [info@fairycastle.ie](mailto:info@fairycastle.ie)

**Please note we may ask you to verify your identity before responding to such requests.**

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## 9. Cookies & Website Tracking

Our website may use cookies to:

- Improve performance
- Analyse traffic
- Remember user preferences

You can manage cookies through your browser settings.

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## **10. International Transfers**

If we transfer data outside the EU/EEA, we ensure appropriate safeguards such as:

- Standard Contractual Clauses (SCCs)
  - GDPR-compliant service providers
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## **11. Children’s Privacy**

We do not knowingly collect data from individuals under **16 years old**.

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## **12. Changes to This Policy**

We may update this Privacy Policy periodically. Updates will be posted on our website with a revised “Last updated” date.

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## **13. Contact Us**

For questions or data-access requests:

**Brazil & Co (Steel) Ltd**

**Email:** [info@fairycastlesteel.ie](mailto:info@fairycastlesteel.ie)

**Phone:** 00353 1 8256482

**Address:** Brazil & Co (Steel) Ltd T/a Fairycastle Steel, Porterstown Lane, Ratoath, Co. Meath.

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