

## **Purpose and Commitment**

Lynam Auctioneers respects your privacy and is committed to protecting the privacy and personal data of all clients, tenants, landlords, employees, and business partners in accordance with the **General Data Protection Regulation (GDPR)** and the **Data Protection Act 2018**.

This policy sets out how we collect, store, use, and protect personal data, and outlines the rights of individuals and the responsibilities of staff in handling personal information.

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## **Purpose of this Privacy Policy**

This privacy policy aims to give you information on how Lynam Auctioneers collects and processes your personal data.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

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## **Controller**

Lynam Auctioneers is the controller and responsible for your personal data.

## **Contact Details**

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Full name of legal entity: Lynam Auctioneers

Email address: [lynam@lynam.ie](mailto:lynam@lynam.ie)

Postal address: 5 Farmhill Road, Goatstown, Dublin 14, D14 CK10

You have the right to make a complaint at any time to the Data Protection Commission (“DPC”), the Irish regulator for data protection issues ([www.dataprotection.ie](http://www.dataprotection.ie)). We would, however, appreciate the chance to deal with your concerns before you approach the DPC so please contact us in the first instance.

## **Scope**

This policy applies to:

- All personal data processed by Lynam Auctioneers during business operations.
  - All employees, contractors, and agents handling such data.
  - Both paper and electronic data systems.
  - It covers data relating to clients, customers, tenants, landlords, suppliers, and staff.
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## **Legal Framework**

The company complies with the following legislation and guidance:

- EU General Data Protection Regulation (GDPR) (EU) 2016/679
  - Data Protection Act 2018 (Ireland)
  - Guidance from the Data Protection Commission (DPC)
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## **Data Protection Principles**

All personal data must be:

1. Processed lawfully, fairly and transparently
  2. Collected for specified, explicit and legitimate purposes
  3. Adequate, relevant and limited to what is necessary
  4. Accurate and kept up to date
  5. Kept no longer than necessary
  6. Processed securely, protecting against unauthorised access, loss, or damage
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## Lawful Bases for Processing

The company processes personal data only where one or more lawful bases apply, such as:

- Performance of a contract (e.g., sales, lettings, or management agreements).
  - Compliance with legal obligations (e.g., PSRA, RTB, or Anti-Money Laundering requirements).
  - Legitimate business interests (e.g., marketing to existing clients).
  - Consent (for optional communications or non-contractual activities).
  - Protection of vital interests (in emergencies).
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## Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

It is important the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

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## Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

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## How is your personal data collected?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.

- **Financial Data** includes bank account, proof of funds, payment card details, income.
- **Transaction Data** includes details about payments to and from you and other details and services and products you have purchased from us.
- **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.

**Profile Data** includes your interests, preferences, feedback and survey response.

**Usage Data** includes information about how you use our website, and services.

**Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

**Special Category Data:** includes health data and data about criminal convictions.

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### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services).

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### **How Data is Used**

Personal data may be used for:

- Property sales, lettings, and management transactions
- Client, tenant, and landlord communications
- Compliance with legal and regulatory obligations (PSRA, RTB, AML)
- Marketing to existing or consenting clients
- Employee administration and payroll

The company will not use personal data for purposes incompatible with those originally stated.

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## Data Retention

Personal data will be retained only for as long as necessary to fulfil its purpose and comply with legal or regulatory requirements.

Typical retention periods:

- Property and tenancy files: **6 years** (tenants)
- AML records: **5 years** after transaction
- Employee records: **7 years**
- Marketing data: until consent is withdrawn

After this period, data will be securely deleted or anonymised.

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## Data Security

The company implements appropriate technical and organisational measures to safeguard data, including:

- Secure password-protected IT systems
  - Encrypted email for sensitive information
  - Locked filing cabinets for paper records
  - Access limited to authorised staff only
  - Regular backups and secure data disposal procedures
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## Data Sharing

Personal data may be shared only where necessary and lawful, such as:

- With professional advisers (solicitors, surveyors, accountants)
- With regulatory bodies (PSRA, RTB, Revenue, HSA)
- With contractors or service providers under confidentiality agreements

Data will never be sold to third parties.

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## **International Transfers**

Where data is transferred outside the European Economic Area (EEA), appropriate safeguards (such as EU-approved standard contractual clauses) will be applied to ensure compliance with GDPR.

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## **Data Subject Rights**

All individuals have the following rights under GDPR:

- Access – to obtain a copy of their personal data
- Rectification – to correct inaccurate or incomplete data
- Erasure (“Right to be Forgotten”) – to request deletion of data in certain circumstances
- Restriction of Processing – to limit how data is used
- Data Portability – to receive their data in a structured format
- Objection – to object to certain processing (e.g., direct marketing)

Requests should be submitted in writing to the Data Protection Officer (DPO) Siobhan Lynam at Lynam Auctioneers.

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## **Data Breach Procedure**

Any suspected or actual data breach (loss, theft, unauthorised access, etc.) must be reported immediately to the DPO or Managing Director.

Serious breaches will be reported to the Data Protection Commission (DPC) within **72 hours**, where required, and affected individuals will be notified if there is a risk to their rights or freedoms.

## **Lynam Auctioneers**