



Data Protection Policy and Procedures

MedWaste Solutions

Site Assessment and Coordination of Clinical Waste Collection Services

1. Policy Statement

MedWaste Solutions is committed to protecting the personal data of our clients, suppliers, contractors, and employees in accordance with the **General Data Protection Regulation (EU) 2016/679 (GDPR)** and the **Data Protection Acts 1988–2018 (Ireland)**.

We recognise that proper handling of personal data is essential to maintaining trust, fulfilling our legal obligations, and ensuring the secure operation of our business.

2. Purpose

The purpose of this policy is to outline how MedWaste Solutions collects, processes, stores, shares, and disposes of personal data in a lawful, fair, and transparent manner.

It ensures that:

- All data processing complies with applicable data protection laws.
 - Individuals understand how their data is used and protected.
 - Staff are aware of their responsibilities in handling personal data.
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3. Scope

This policy applies to all:

- Employees, contractors, and management within MedWaste Solutions.
- Systems, communications, and documents (electronic or paper) containing personal data.
- Data collected from clients, suppliers, or partners during service coordination or site visits.

It covers personal data such as:

- Contact details (names, phone numbers, email addresses, etc.)
 - Client site details and records related to waste management coordination
 - Employee HR and payroll data
 - Supplier and contractor information
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4. Data Protection Principles

MedWaste Solutions adheres to the following GDPR principles:

1. **Lawfulness, fairness, and transparency** – Data is processed lawfully and individuals are informed about how it is used.
 2. **Purpose limitation** – Data is collected only for legitimate business purposes and not used in ways incompatible with those purposes.
 3. **Data minimisation** – Only the minimum necessary data is collected and processed.
 4. **Accuracy** – Data is kept accurate and up to date.
 5. **Storage limitation** – Data is retained only for as long as necessary to fulfil its purpose or legal requirements.
 6. **Integrity and confidentiality** – Data is handled securely to prevent unauthorised access, loss, or damage.
 7. **Accountability** – The company maintains records and documentation demonstrating GDPR compliance.
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5. Legal Basis for Processing

MedWaste Solutions processes personal data under one or more of the following legal bases:

- **Performance of a contract** – To deliver services and manage client relationships.
 - **Legal obligation** – To comply with regulatory or waste management reporting requirements.
 - **Legitimate interests** – For business administration, service improvement, or communication.
 - **Consent** – Where specific permission is required (e.g., marketing or information sharing).
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6. Data Collection and Use

We collect and process data primarily for:

- Managing client contracts and communications.
- Coordinating licensed waste collection and disposal services.
- Conducting site assessments and maintaining service records.
- Managing suppliers and contractors.
- Fulfilling legal and regulatory obligations.

No special category (sensitive) personal data — such as medical or health data — is intentionally collected or processed by MedWaste Solutions.

7. Data Security Measures

MedWaste Solutions applies appropriate technical and organisational measures to safeguard data, including:

- Secure cloud-based systems with access controls and encryption.
 - Password-protected devices and user accounts.
 - Restricted access to data on a “need-to-know” basis.
 - Regular data backups and antivirus protection.
 - Physical document security (locked storage, limited access).
 - Staff training on data protection and confidentiality.
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8. Data Retention and Disposal

- Data is retained only for the period necessary to fulfil its purpose or comply with legal obligations.
 - Once no longer required, data is securely deleted or shredded.
 - Retention schedules are reviewed periodically to ensure compliance.
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9. Data Sharing and Third Parties

Personal data may be shared only with:

- Licensed waste collection and disposal partners (where necessary for coordination).
- Regulatory bodies (if legally required).
- Service providers under contract (e.g., IT, payroll, or audit services).

All third parties must comply with GDPR and maintain adequate data protection standards.

10. Data Subject Rights

Individuals whose personal data is held by MedWaste Solutions have the right to:

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

Requests should be directed to the **Data Protection Officer (DPO)** via info@med-wastesolutions.ie.

Responses will be provided within one month, as required by GDPR.

11. Data Breach Management

In the event of a suspected or confirmed data breach:

1. The DPO must be notified immediately.
2. An investigation will be initiated to assess impact and containment measures.
3. The Data Protection Commission (DPC) and affected individuals will be notified where required within 72 hours.
4. Incident reports and corrective actions will be documented.

12. Roles and Responsibilities

Data Protection Officer (DPO):

- Oversees implementation of this policy.
- Maintains data processing records.
- Acts as point of contact for the DPC and data subjects.

All Employees:

- Must handle data responsibly and follow company procedures.
- Report any suspected data breaches immediately.

13. Policy Review and Updates

This policy will be reviewed annually or whenever there are significant changes to legislation or company operations.

All revisions will be communicated to staff and made available to clients and partners upon request.
