Last Updated: 30th October 2026

1 About Us

We are STS Group.

You can find us at: Block 10A, Cleaboy Business Park, Old Kilmeaden Road, Waterford. You can contact our DPO via Email: **compliance@stsgroup.ie**

Our website is: **https://stsgroup.ie/**

This Data Protection Guideline applies to the following companies in the STS Group as follows:

- Specialist Technical Engineering Services Unlimited Company
- STS Group Switzerland AG
- STS Elektromechanische Anlagenbau GmbH
- STS Specialist Technical Services UK Ltd
- Specialist Technical Services Sweden AB
- STS Buhindi W.L.L
- Specialist Technical Engineering Services B.V
- STS D&V Group
- STS Denmark ApS
- STS Specialist Technical Services France SAS

References to “We”, “Us” the “Company” and “STS” or “STS Group” shall apply to the company in the group that is processing your Personal Data.

STS Group, headquartered in Ireland, is part of Dussmann Technical Solutions. We employ over 1,600 people who are dedicated to safely and successfully delivering projects across Ireland, the UK, Europe, and the Middle East. We provide electrical and instrumentation services in Life Sciences, Data Centres, Food & Beverage, and Transmission & Distribution sectors. Our success is reflected in the strong relationships we’ve built with our clients. Many return to us year after year, while we continue to grow our customer base with new partnerships.

In order to provide our services, we need to process Personal Data. We are committed to protecting the rights personal data of individuals in accordance with data protection legislation including the General Data Protection Regulation in Europe (the “GDPR”).

2 Contact Details

If you have any questions about this Data Protection Guideline or the way in which your Personal Data is being used by us, please contact **compliance@stsgroup.ie**

3 Brief description:

This Data Protection guideline describes our approach to data protection and sets out the basis on which any Personal Data we collect from you, or that you provide to us, will be used by us where we are controllers of that Personal Data for the purposes of the GDPR. Please read this Data Protection guideline carefully to understand our views and practices regarding the Personal Data we collect, as controllers under the GDPR, and how we will treat it.

4 Purpose

This Guideline describes the definition of Personal Data as follows:

“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.

5 Responsibility for the content

The HR Department of STS Group is responsible for the contents and the creation or updating, checking and internal communication of this Guideline.

6 Who This Data Protection Guideline Applies To

This Data Protection Guideline provides specific information relating to the following individuals whose Personal Data we process:

- business contacts including our clients, suppliers, partners, shareholders, investors and business prospects “Business Contacts”
- users/guests of our website “Website Users”.
- prospective employees/those applying for jobs with Us “Candidates”

Personal Data of employees of the Company is dealt with in a separate internal Data Protection notice.

7 Sources Of Personal Data

Business Contact Personal Data

We collect Business Contact Personal Data from our business contacts including – clients, suppliers, partners, shareholders, investors and business prospects.

We source Business Contact Personal Data in order to serve the business relationship. We will only ever source Personal Data that is necessary and in a way that would be generally expected.

We receive Personal Data about Business Contacts from a variety of sources, as follows:

- the Personal Data is often provided by the Business Contact as part of the business relationship
- the Personal Data may be collected from public sources like LinkedIn
- the Personal Data may be collected indirectly from another person within the company of the Business Contact
- the Personal Data may be collected through our website
- the Personal Data may be collected indirectly from a website or from a third party.

Candidate Personal Data

We will only ever source Personal Data in a way that would be generally expected.

We receive Personal Data relating to Candidates from a variety of sources. The primary source is from Candidates directly. Examples of the sources of Personal Data of Candidates are as follows:

- the Candidate may send a speculative CV to us with the intention of registering with us to be informed of potential job vacancies
- the Candidate may apply directly to a position advertised on our website
- the Candidate may be referred to us from an agency or by an individual or
- the Candidate may apply to a position advertised on a third-party jobs' website.

Website User Personal Data

We may collect Website User Personal Data from all visitors to our website in order to improve our services and develop the Website. For more details, please refer to our Cookie Management Tool.

8 Categories Of Personal Data

We process the following categories of Personal Data. For each category we have included a description of the type of Personal Data that may be part of that category:

Personal Data Category	Description
General Personal Data	
Identification Data	may include a person's name, photograph, date of birth, driver's license and passport information.
Contact Data	may include a person's email address, phone number, postal address, other communication details (e.g. Social Media links)
Communication Data	may include phone calls, texts, email correspondence and hard copy correspondence.
Marketing Data	may include Identification Data and Contact Data and any preferences in receiving marketing from us and your communication preferences.
Web Data	may include Personal Data provided on any forms on our website and, to the extent that it includes Personal Data, information on the type of device you're using, its IP address, operating system, referral source, length of visit, page

	views and website navigation paths, as well as information about the timing, frequency and pattern of your service use.
Finance Data	Bank account and tax details for the purposes of payments
Personal Data relating only to Candidates	
Recruitment Data	May include identification Data, Contact Data, CV data, and job application data that we collect as part of the recruitment process, and which is retained on your employee file. When processing CV data, we may process certain Personal Data including the following: date of birth, employment history (including start and end dates, with previous employers and with the company), skills/experience, languages, educational history, qualifications, membership of professional associations, certifications, contact details of employer references/character references, licenses held, interests and hobbies, languages, locations, nationality, passport, eligibility to work in certain jurisdictions, salary expectations, marital status. As part of processing Recruitment Data, we process interview/screening answers and notes and usernames and passwords for access to our recruitment portal.
Special Category Recruitment Data	If we interact with you for the purposes of a job with the Company, we may collect Recruitment Data that is of a special category per the GDPR definition: this can include diversity data such as gender, religion, racial or ethnic origin, sexual orientation, trade union membership or data relating to health.

9 Our Legal Basis for Processing Personal Data

We process all Personal Data lawfully and in accordance with the requirements of the law. The GDPR sets out the legal grounds for processing Personal Data.

When the Company processes Personal Data it is generally on one of the following legal basis:

Contract

We will process Personal Data where necessary to perform our obligations relating to or in accordance with any contract that we may have with you or to take steps at your request prior to entering into that contract (e.g. our Client Services Agreement);

Consent

For certain processing activities we may rely on your consent. e.g. we request your consent for adding you to our mailing list.

Where we are unable to collect consent for a particular processing activity, we will only process the Personal Data if we have another lawful basis for doing so.

You can withdraw consent provided by you at any time by contacting us at:

compliance@stsgroup.ie

Legitimate Interest

At times we will need to process your Personal Data to pursue our legitimate business interests, for example for administrative purposes, to collect debts owing to us, to provide information to you, to expand our business opportunities, to operate, evaluate, maintain, develop and improve our websites and services or to maintain their security and protect intellectual property rights.

We will not process your Personal Data on a legitimate interest basis where the impact of the processing on your interests or fundamental rights and freedoms outweigh our legitimate interests.

You may object to any processing we undertake on this basis. If you do not want us to process your Personal Data on the basis of our legitimate interests, contact us at

compliance@stsgroup.ie and we will review our processing activities.

Legal Obligation

If we have a legal obligation to process Personal Data, such as the payment of taxes, we will process Personal Data on this legal ground.

10 Our Processing Activities

We use your Personal Data to provide you with our services and to assist us in the operation of Company. Under data protection law, we must ensure that the purpose of processing is clear.

We have set out below the general purpose of processing, the categories of Personal Data processed and the related lawful basis for processing.

Purpose of Processing	Categories of Personal Data	Lawful Basis
Sales & Marketing Activities • to respond to any requests from you • to send newsletters and other information that maybe of interest • to contact you as part of our business relationship or for lead generation and general administration • to inform you of events or webinars that might be of interest • to issue tenders for prospective projects	• Marketing Data • Contact Data • Web Data	• Consent • Legitimate Interest
Recruitment Activities • as part of agency shortlisting • to select the right Candidate • to interview the Candidate • to hire and seek to onboard the Candidate (precontract) • to manage our database of prospective Candidates	• Identification Data • Contact Data • Communication Data • Recruitment Data • Web Data • Marketing Data • Special Category Recruitment Data • Reference Provider Contact	• Consent • Legitimate Interest • Contract

Website Delivery • to respond to web forms completed by you • to promote our products and services • to improve and administer the Website; and • for internal operations, including support, troubleshooting, data analysis, testing, research, statistical and survey purposes • to ensure the safety and security of our website and our services.	• Web Data	• Consent • Legitimate Interest
Administration of Customer Relationship • to manage/respond to a complaint/issue • to maintain customer relationships	• Identification Data • Contact Data • Communication Data • Financial Data	• Contract • Legitimate Interest
Managing payments and administration of contract • to process payments to and from our business to manage and administer our contracts	• Identification Data • Contact Data • Communication Data • Financial Data	• Contract • Legitimate Interest • Legal Obligation
Management of Corporate Affairs • to take minutes at board meetings • to contact shareholders/investors • to enter into partnerships and other commercial relations • to undertake appropriate due diligence • to manage legal disputes	• Identification Data • Contact Data • Communication Data • Financial Data	• Contract • Legitimate Interest • Legal Obligation

11 Disclosure of Personal Data

In certain circumstances, we may disclose Personal Data to third parties as follows:

- to business partners and subcontractors for the performance of any contract relating to our services, including email, Communication Platforms, Customer Relationship Management system, web developers, payment processors, hosting service providers, external consultants, auditors, IT consultants and lawyers;
- to any recruitment agency who is helping us to recruit Candidates;
- to analytics and search engine providers that assist us in the improvement and optimisation of the Website;
- if we or substantially all of our company is merged with another company or acquired by a third party, in which case Personal Data held by us will be one of the transferred assets;
- to other companies in the STS group of companies for the purposes of administration, marketing, recruitment and provision of our services;
- if we are under a duty to disclose or share Personal Data in order to comply with any legal obligation (including tax, audit or other authorities), or in order to enforce or apply any contracts that we have;

- to protect our rights, property, or safety, or that of our Candidates or Business Contacts or others. This may include exchanging Personal Data with other companies and organisations for the purpose of fraud protection. When we engage another organisation to perform services for us, we may provide them with information including Personal Data, in connection with the performance of those functions. We do not allow third parties to use Personal Data except for the purpose of providing these services.

12 Security Measures

We will take all steps reasonably necessary to ensure that all Personal Data is treated securely in accordance with this Data Protection Guideline and the relevant law, including the GDPR.

In particular, we have put in place appropriate technical and organisational procedures to safeguard and secure the Personal Data we process.

We monitor for and do everything we can to prevent security breaches of the Personal Data that we process.

Once we have received your Personal Data, we will use strict procedures and security features for the purpose of preventing unauthorised access and ensuring that only those who need to have access to your Personal Data can access it.

We also use secure connections to protect Personal Data during its transmission. Where you have been given (or where you have chosen) a password which enables you to access services, you are responsible for keeping this password confidential. Please do not share your password with anyone.

If you think that there has been any loss or unauthorised access to Personal Data of any individual, please let us know immediately.

13 Transfers Outside The EEA

In order to provide our products and services we may need to transfer Personal Data outside the European Economic Area (EEA). We ensure that any transfer of Personal Data outside the EEA is undertaken using legally compliant transfer mechanisms and in accordance with the GDPR.

If we transfer Personal Data outside of the EEA, we generally rely on the Standard Contractual Clauses under Article 46.2 of the GDPR adopted by the EU Commission. We may also rely on some of the other legally compliant transfer mechanisms provided under the GDPR.

14 Cookies

Cookies are text files that are placed on your computer by websites that you visit, which are then used to record information about your visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website and to third parties.

Cookies help us to remember things about your visit to our website, such as your preferred language and other choices/settings, and to generally make the site easier for you to use.

We provide a cookie consent management tool that can be accessed at all times from a small widget on the bottom left corner of our website. You can vary consent for cookies at any time while visiting the website by interacting with this tool. Any change in consent will have immediate effect on the cookies that are dropped onto your device.

You can also adjust your browser settings to decline cookies or alert you when a website is attempting to place a cookie on your computer. Most browsers provide tools to enable you to set global settings regarding your cookie preferences, usually found in the "Privacy & Security" section of your browser settings.

15 Third Party Websites

Our Website may contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy settings, and these are not endorsed by us. We do not accept any responsibility or liability for these third-party websites. Please undertake the appropriate due diligence before submitting any Personal Data to these websites.

16 Retention

In some circumstances it is not possible for us to specify in advance the period for which we will retain your Personal Data. In such cases we will determine the appropriate retention period based on balancing your rights against our legitimate business interests. We may also retain certain Personal Data beyond the periods specified herein in some circumstances such as where required for the purposes of legal claims.

Further information about our retention practices is set out below:

Purpose of Processing	Retention Period
Recruitment Activity	18 months for Candidates who are not hired
Managing Payments and administration of the contract	Up to 10 years
Management of Corporate Affairs	Up to 10 years unless required to retain indefinitely

17 Your Rights

You have various rights relating to how your Personal Data is used.

Right of access to the Personal Data, we hold on you

You have the right to ask for all the Personal Data we have about you.

We will provide the first copy of your Personal Data free of charge, but we may charge you a reasonable fee for any additional copies.

We cannot give you access to a copy of your Personal Data in some limited cases including where this might adversely affect the rights and freedoms of others.

Right of rectification of Personal Data

You should let us know if there is something inaccurate in your Personal Data.

We may not always be able to change or remove that Personal Data, but we will correct factual inaccuracies and may include your comments in the record to show that you disagree with it.

Right of erasure of Personal Data (right to be forgotten)

In some circumstances you can ask for your Personal Data to be deleted, for example, where:

- your Personal Data is no longer needed for the reason that it was collected in the first place
- you have removed your consent for us to use your Personal Data (where there is no other lawful basis for us to use it)
- there is no lawful basis for the use of your Personal Data
- deleting the Personal Data is a legal requirement

Please note that we can't delete your Personal Data where:

- we are required to have it by law
- it is used for freedom of expression
- it is used for public health purposes
- it is used for scientific or historical research or statistical purposes where deleting the Personal Data would make it difficult or impossible to achieve the objectives of the processing
- it is necessary for legal claims.

Right to restrict what we use your Personal Data for

You have the right to ask us to restrict what we use your Personal Data for where:

- you have identified inaccurate Personal Data, and have told us of it
- where we have no legal reason to use the Personal Data, but you want us to restrict what we use it for rather than erase the Personal Data altogether
- When Personal Data is restricted, it can't be used other than to securely store the Personal Data and with your consent to handle legal claims and protect others, or where it's for important public interests.

Right to have your Personal Data moved to another provider (data portability)

You have the right to ask for your Personal Data to be given back to you or another service provider of your choice in a commonly used format. This is called data portability.

This right only applies if we're using your Personal Data with consent and if decisions were made by a computer and not a human being. It does not apply where it would adversely affect the rights and freedoms of others.

Right to object

You have the right to object to processing of your Personal Data which is based on public interest or legitimate interest processing. We will no longer process the Personal Data unless we can demonstrate a compelling ground for the processing.

Right not to be subject to automated decision-making

You have the right not to be subject to a decision based solely on automated processing. This right shall not apply where the processing is necessary for a contract with you, or the processing is undertaken with your explicit consent, or the processing is authorised by law.

You can make a complaint

You have the right to lodge a complaint with the local supervisory authority for data protection in the EU member state where you usually reside, where you work or where you think an infringement of data protection law took place.

18 Amendments To This Data Protection Guideline

We will post any changes on the Website and when doing so will change the effective date at the top of this Data Protection Guideline. Please make sure to check the date when you use our services to see if there have been any changes since you last used those services.

In some cases, we may provide you with additional notice of changes to this Data Protection Guideline, such as via email. We will always provide you with any notice in advance of the changes taking effect where we consider the changes to be material.

Thank you for reading our Data Protection Guideline. Please **Contact Us** if you have any questions. If we are unable to resolve your concerns, you have the right to contact the supervisory authority in the country where you live or work, or where you consider that the data protection rules have been breached

Contact Details for the relevant Supervisory Authorities are set out below for your information:

Country	Supervisory Authority	Contact Details
Ireland	**Data Protection Commission**	**Online Form**: https://forms.dataprotection.ie/contact **Address**: 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland **Tel:** +353 578 684 800 or +353 761 104 800
EU List	**EU List**	**Contact Information**: https://www.edpb.europa.eu/about-edpb/about-edpb/members_en