

[INSERT COMPANY HEADER]
[NAME OF COMPANY]
CUSTOMER PRIVACY NOTICE (Template)

Who are we?

[COMPANY NAME] is an [Irish] registered company with a registered address of [INSERT ADDRESS] (the “**Company**”). You can contact the Company at [INSERT ADDRESS] by post or by email at [INSERT EMAIL ADDRESS].

It is important that you read this privacy notice together with the Company’s [INSERT TERMS OF SERVICE LINK], and any other privacy notice or fair processing notice the Company may provide on specific occasions when it is collecting or processing personal data about you (“**Data**”) so that you are fully aware of how and why the Company is using your data. This privacy notice supplements the other notices and is not intended to override them.

For the purposes of GDPR the data controller is the Company. This means that the Company is responsible for determining how Data relating to you is used, stored and shared.

What is the purpose of this notice?

The Company is committed to protecting the privacy and security of your Data. This privacy notice describes how the Company collects, maintains and uses Data, when you visit, [use services/products provided by the Company (the “**Services**”)]¹, purchase from the Company or otherwise communicate with the Company in accordance with the General Data Protection Regulations 2016/679 (“**GDPR**”) and the Data Protection Acts 1988 – 2018 (as amended) (the “**Data Protection Act**”) (together “**Data Protection Laws**”).

[It applies to your Data when you visit the Company’s websites, including any Data you may provide through the websites, when you sign up to any newsletter, use the Services, speak to Company staff, apply for a job with the Company or when you otherwise interact with the Company or provide personal information on you or individuals connected with you. Where necessary, the Company will provide additional information in relation to specific Services.]²

¹ **Note:** To be amended based on the services/products the Company provides.

² **Note:** To be amended based on the services the Company provides.

For the purposes of this privacy notice ‘you’ means user of the Services.

Children

The Company websites are not intended for [children] OR [persons under the age of 18 years old] and we do not knowingly collect data relating to [children] OR [persons under the age of 18 years old]. If you have reason to believe that a child has provided personal information to us, please contact us at [INSERT EMAIL ADDRESS], and we will use commercially reasonable efforts to delete that information unless we are required, by law or in connection with the enforcement or defence of our rights, to retain this information unless we are required, by law or in connection with the enforcement or defence of our rights, to retain this information.]³

Social media and third-party links

The Company’s websites and Services may have social media features, such as the Facebook Like button, and widgets (such as for sharing a page). These features, which are hosted by third parties, collect data similar to the Technical Data mentioned below, and set a cookie to enable the feature to function properly. They also contain links to websites operated by third parties that may be of interest or that are relevant to the Services. If you use these links, you will leave our site, and you should note that the Company does not have any control over that other websites and cannot be responsible for the protection and privacy of any information that you provide while visiting such sites. Providing a link to third party websites does not mean that the Company endorses or warrants the services provided by any third parties and this privacy notice does not govern such sites. These third parties and the social media providers described earlier will have their own privacy notices that will govern the data they collect.]

Who is the Data Protection Officer?⁵

[[INSERT INDIVIDUALS NAME] is the Data Protection Officer for the Company and may be contacted by [INSERT CONTACT DETAILS] (the “DPO”).]

³ **Note:** To be removed if not compatible with Company services

⁴ **Note:** To be deleted if the Company does not maintain a social media presence.

⁵ **Note:** to be included only where a DPO has been appointed.



What are the Data Protection Principles under GDPR?

The Company will comply with GDPR and under article 5 of GDPR the key principles are set out as follows:

- i. Data must be processed in a lawful, fair, and transparent manner.
- ii. Data must only be collected for a legitimate purpose and must not be used for any way that is incompatible with the legitimate purpose.
- iii. Data held must be accurate and kept up to date.
- iv. Data must only be held for as long as is necessary for the legitimate purpose for which it is processed.
- v. Data must be processed in a secure and confidential manner.
- vi. Data must be adequate, relevant and limited to what is necessary in relation to the legitimate purpose for which it is processed.

How will your Data be collected?⁶

The Company collects Data when you;

- Register online;
- Place an order;
- Request a service from the Company;
- Use or view the Company's website via your browser's cookies;
- Engage with the Company on social media;
- Contact the Company with a complaint or query;
- Complete a customer survey or provide feedback;
- Request information to be sent to you (e.g. when viewing demos);
- Enter a survey; or
- Apply for a job.

⁶ **Note:** Delete any that are not applicable and insert any other applicable collection points.

What kind of Data does the Company hold about you?⁷

In line with article 5 of GDPR, the Company will only collect and hold Data necessary for your relationship with the Company.

The Company will collect, store, and use the following categories of Data about you:

- **Identity Data** - first name, maiden name, last name, username or similar identifier, job title/position, date of birth, height and gender.
- **Contact Data** - employer, work address, email address and mobile phone numbers.
- **Financial Data** - transaction amount, payment method, payment date, bank account information, cardholder details (last 4 digits of card number, expiry date of card and potentially cardholder name) and VAT number where applicable.
- **Profile Data** - account password, account number and account age.
- **Technical Data** - geolocation, internet protocol (IP) address, device identifier, 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 our websites and/or Services.
- **Customer Support Data** - information you provide to the Company related to the use of the Services which may be used to help you resolve your query (such as screenshots and/or recordings of issues as they happen on your screen during a customer support call), administrator permission status of the user contacting the Company, information on the use of the Company's customer support feature you use and any feedback you provide in respect of these features.
- **Cookies** - information about your preferences and the way you use the Services is collected through cookies. [\[INSERT LINK TO COOKIES POLICY\]](#).
- **Usage Data** - information about how you use the websites and Services such as the number of projects on an account (active and archived), your site URL, geographical location, your internet service provider, your IP address, the time, frequency and duration of your activities, when you are online and when you update your settings. The Company also record information about the software you are using to browse our websites, such as the type of computer or device and the screen resolution.
- **Marketing Data** - your preferences in relation to receiving electronic marketing from the Company and its third parties.
- Any other data that can be used to identify an individual.

Unless required by law, the Company will not, without your explicit consent, collect the following sensitive personal information under Article 9 GDPR (known as "**Special Category Data**"): ⁸

- Race and/or ethnicity.
- Sexual orientation.

⁷ **Note:** To be amended based on actual Data collected. Any information not collected to be deleted and any additional information included.

⁸ **Note:** To be amended to include specific details of any special category data processing. There are other criteria explicitly listed in Article 9 GDPR for which special category data can be processed (e.g. for healthcare or the vital interests of data subjects) and which may be applicable depending on the circumstances.

- Trade union membership.
- Health information (i.e., medical conditions, health and sickness records, etc.).
- Details of any absences from work including time on statutory parental leave and sick leave.
- Genetic information and/or biometric data.
- Information about criminal convictions and offences.

The Company will only process Special Category Data in limited circumstances and in accordance with Data Protection Laws.

Third parties or publicly available sources.

The Company may receive Data from various third parties, including Identity and Contact Data from your employer and/or publicly available sources like the Companies Registration Office in Ireland and LinkedIn and Technical Data from analytics providers/advertising networks and search information providers.

How will the Company process your Data?⁹

Set out below is a description of all the ways the Company may process your Data (details of which of the legal bases it relies on to do so is set out at Annex A to this privacy notice). The Company will only process your Data in accordance with Data Protection Laws. The Company will use your Data:

- **Performance of a Contract:** Where it is necessary to perform the contract (or engagement) the Company has entered with you.
- **Legal Obligation:** To comply with a legal obligation to which the Company is subject.
- **Legitimate Interests:** Where necessary, the Company will process Data based on its legitimate interests, and will do so in a fair, transparent and accountable manner and take appropriate steps to prevent such activity having any unwarranted impact on you. The Company does not process your Data where such legitimate interests are overridden by your interests, fundamental rights or freedoms.
- **Consent:** The Company generally does not rely on consent as a legal basis for processing your Data other than in relation to sending, either from the Company or from third parties¹⁰, direct marketing communications to you via email, text message or phone calls. Where the Company relies on your consent to process your Data, you have the right to withdraw your consent at any time by emailing us at [INSERT EMAIL ADDRESS], although withdrawal of your consent to process your Data may render us unable to provide services to you (or your employer).

⁹ **Note:** Delete any that are not applicable and insert any other applicable collection points.

¹⁰ **Note:** To be deleted if the Company does not engage in direct marketing.

Change of purpose

The Company will only use the Data for the purpose for which the Company collected it, unless it is reasonably considered that the Company needs to use it for another reason and that reasonable remains compatible with the original legitimate purpose.

What happens if you fail to provide the Data?

The Company cannot provide our Services [(as defined in the Terms of Service)] to you or the organisation you represent without processing your Identity Data, Contact Data, Profile Data, Technical Data, Usage Data, Customer Support Data and Geolocation Data.

Use of cookies

The Company automatically collects certain Data about your interaction with the website. Automated technologies may include the use of Cookies. Other cookies such as functional cookies, marketing cookies and analytical cookies will only be used with your expressed consent. Data collected may include Data about how you access and use the Company website, information about your account including device information, browser information, information regarding your network connection and your IP address. Please see our Cookies Policy for further details.¹¹

Who has access to your Data?

Access by Company Personnel

The Company allows access to Data only to those employees, and consultants who have a need to access the information for a lawful purpose. The Company trains its employees how to appropriately handle Data and require that consultants do likewise.

Access by other third parties

¹¹ **Note:** hyperlink to Cookies Policy to be included. A separate policy for cookies is general used in conjunction with a cookies banner to satisfy data protection laws related specifically to cookies.

The Company may share your Data with third parties where required by law, where it is necessary to administer the contract the Company has entered in to with you or where the Company has another legitimate interest in doing so (e.g. third parties who provide the Company with certain services, including websites maintenance, database and cloud, customer support, customer analytics, payment processing, payroll and benefits management or other services). Recipients of your Data may include third-party service providers, other related business entities, a regulator, or to otherwise comply with the law.

[INSERT MORE INFORMATION RELATING TO THE TYPE OF BUSINESS AND TYPE OF ACCESS].

Law Enforcement, Court Orders and Protection of Our Rights

The Company may disclose any of your information to government officials as necessary to comply with applicable laws and orders. The Company may disclose your Data to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. In the event that the Company is legally compelled to disclose your personally identifiable information to a third party, the Company will attempt to notify you unless doing so would violate the law, court order or government instruction.

¹²Affiliates

The Company may disclose information (including personally identifiable information) about you to its Affiliates. Company "Affiliates" are any person or entity which directly or indirectly controls, is controlled by or is under common control with the Company, whether by ownership or otherwise. Any information relating to you that the Company provides to its Affiliates will be treated by those Affiliates in accordance with the terms of this privacy notice.]

Other Disclosures

The Company may also disclose your information if it believes it is necessary in order to protect its property rights or rights of a third party, to protect the safety of any person or of the public or to prevent any activity that it believes is harmful, illegal or unethical. The Company will put in place appropriate security measures, such as non-disclosure agreements, whenever possible.

Will your Data be transferred outside the EEA?¹³

The Company transfers Data relating to [INSERT SPECIFIC ACTIVITY] to [SERVICE PROVIDER] located in [SPECIFY COUNTRY OUTSIDE THE EEA]. The safeguards the Company has put in place for this transfer is to include in the agreement with [SERVICE PROVIDER], European Commission approved standard contractual clauses.

¹² **Note:** To be deleted if not applicable.

¹³ **Note:** To be repeated for each of the transfers to third countries, i.e., any country outside of the EEA.

The Company may transfer, store and process your Data outside the country you live in where required by law or where it is necessary to administer the working relationship with you or where the Company have another legitimate interest in doing so. Your Data is also processed by staff and third-party service providers and partners in these countries.

In the event the Company transfers Data relating to [INSERT SPECIFIC ACTIVITY] to [SERVICE PROVIDER] located in [Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Republic of Korea, Switzerland, the United Kingdom, or Uruguay]¹⁴, the Company will rely on Article 45 of the GDPR (Transfers based on an adequacy decision). More information regarding adequacy decisions can be found [here](#).

In the event the Company transfers Data to a country in respect of which the European Commission has not adopted an adequacy decision and the Company will transfer this Data on the basis of Article 46 of the Data Protection Legislation (Transfers subject to appropriate safeguards). The Data safeguards the Company has put in place for this transfer is to include in the agreement with [SERVICE PROVIDER], European Commission approved standard contractual clauses.

Please contact [INSERT CONTACT DETAILS] if you want further information on the specific mechanism used by the Company when transferring your Data out of the European Economic Area.

How long will your Data be retained by the Company?¹⁵

The Company will only retain your Data for as long as necessary to fulfil the purpose it collected it for, including for the purposes of satisfying any legal or contractual requirements. To determine the appropriate retention period for Data, the Company considers the amount, nature, and sensitivity of the Data, the potential risk of harm from unauthorised use or disclosure of your Data, the purposes for which the Company processes your Data and whether it can achieve those purposes through other means, and any applicable legal or contractual requirements.

The Company keeps basic information about its customers (including contact and identity Data of customers' representatives) for six (6) years after the Company's relationship with them ceases. Thereafter, the Company and its duly authorised delegates will refrain from collecting any further Data and shall take appropriate steps to dispose of any records containing your Data, to the extent this is operationally feasible and proportionate. The Company reserves the right to delete and destroy all of the information collected about you in accordance with its retention policies unless otherwise required by law.

¹⁴ **Note:** Delete as appropriate.

¹⁵ **Note:** this should be aligned with internal retention policies. 7 years is often included for defence of legal claims.

Your rights in relation to your Data

Under the Data Protection Act, you have the following rights in respect of your Data:

1. **Right to be informed:** This requires the Company to keep you informed of the use and/or erasure of your Data throughout your relationship with the Company.
2. **Right of access:** This enables you to request a copy of the Data the Company holds about you and to check it is being lawfully processed.
3. **Right to rectification:** This enables you to ask the Company to have any incomplete or inaccurate Data held about you corrected.
4. **Right to erasure (right to be forgotten):** This enables you to have any Data held about you removed or deleted from the Company's files where there is no good reason for the Company to continue processing the Data. You also have the right to ask the Company to delete or remove your Data where you have successfully exercised your right to object to processing (see below), where the Company may have processed your information unlawfully or where the Company is required to erase your Data to comply with local law. Note, however, that the Company may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
5. **Right to restriction of processing:** This enables you to request that the Company no longer processes your Data for a particular purpose or to object to the Company's processing of your Data for particular purpose in the following scenarios:
 - If you want the Company to establish the Data's accuracy.
 - Where the Company's use of the Data is unlawful but you do not want the Company to erase it.
 - Where you need the Company to hold the Data even if the Company no longer requires it as you need it to establish, exercise or defend legal claims.
 - You have objected to the Company's use of your Data but the Company needs to verify whether it has overriding legitimate grounds to use it.
6. **Right to object:** This enables you to stop or prevent the Company from using your Data, where it is relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where the Company is processing your Data for direct marketing purposes. In some cases, the Company may demonstrate that it has compelling legitimate grounds to process your information which override your rights and freedoms.
7. **The Right to Data portability:** In some circumstances, you may be entitled to obtain your Data from a data controller in a format that makes it easier to reuse your information in another context, and to transmit this data to another controller of your choosing without hindrance.

If and to the extent that the Company processes your Data based on your consent, which you may withdraw at any time. This removal of consent will not affect the lawfulness of the processing which has previously taken place. To exercise any of the above-mentioned rights, please contact the DPO (details listed above).

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MAPLES
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WALLACE
SHIELDS

RDJ

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Masons

MASON
HAYES &
CURRAN

ATLANTIC
BRIDGE

Seroba.

Automated decision-making and profiling

The Company does not conduct any automated decision-making or profiling activities whilst processing your Data.

OR

If a decision is taken by automated means, you have the right to object to this and ask us to reconsider the service you have asked us to provide. Automated decisions that the Company undertakes include [insert automated decisions].¹⁶

Security of Personal Data

The Company securely stores your Data in a centralised database, with controlled access to such database. Access to Data (including Special Category Data) in both electronic and paper form is restricted to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on the Company's instructions and they are subject to a duty of confidentiality.

You have a role to play in security as well, and the Company asks that you use prudent measures to protect against unauthorised access to your account information, including logging out of your account when finished, not sharing your login information and taking other customary security precautions appropriate for the situation. The type of organisational or technical measures the Company uses to secure its systems and data may differ depending on the sensitivity of the data and the Company's assessment of how accidental or unauthorised disclosure or use of the data could threaten the rights and freedoms of natural persons.

What if there is a Security or Data Breach?

GDPR obliges the Company to notify the Data Protection Commission and affected data subjects in the case of certain types of personal data security breaches. The Company will manage a data breach in accordance with their personal data security breach procedure and Data Protection Law. If you become aware of or suspect that a breach has taken place you are required to immediately notify the DPO.

Changes to this notice

The Company reserves the right to update this privacy notice at any time and will post the revised privacy notice on the Company website and update the 'last updated' date. You can request the most up to date version from us at any time by contacting the Company at the details listed at the beginning of this notice.

¹⁶ **Note:** To be confirmed by the Company. To the extent automated decision making takes place, meaningful information about the logic used and the significance and envisaged consequences of such processing to the data subject must be included.

Complaints Procedure

If you any questions about this privacy notice or if you are unhappy with how the Company is processing your Data, please contact the Data Protection Officer whose contact information is listed above.

You may lodge a complaint with the Irish supervisory authority in respect of anything included in this notice. The Irish supervisory authority is the Data Protection Commission and its details are set out below:

Data Protection Commission
21 Fitzwilliam Square South
Dublin 2
D02 RD28
info@dataprotection.ie

[ANNEX]¹⁷

Purpose/Activity	Processing Operations	Personal Data	Lawful basis
Service Provision: Providing of the Company's Service to you including: (a) registering you as a new customer or authorised user of one of our customers; (b) assisting you in creating your account and in using your account across multiple devices; (c) administering subscriptions;	Collection recording organising storing retrieving consulting	(a) Identity (b) Contact (c) Financial (d) Customer Support (e) Technical	Where you are the Company's customer, this processing is necessary for the performance of the Company's Terms of Service with you. Where you are a representative of the Company's customer this processing is necessary

¹⁷ **Note:** To be reviewed and it confirmed the extent to which the above processing is applicable to it.

<p>(d) providing relevant information to you in connection with your use of our Services including transaction receipts, security alerts and support messages;</p> <p>(e) assisting you with using video conferencing services including making, receiving, joining and leaving video calls;</p> <p>(f) encrypting messages exchanged on our platform;</p> <p>(g) managing payments, fees and charges and collecting and recovering money owed to us; and</p> <p>(h) where applicable, providing customer support.</p>	<p>using restricting</p>	<p>(f) Usage</p>	<p>for its legitimate interests¹⁸ to enter into, perform and enforce our Terms of Service.</p>
<p>Marketing: Contacting you (by email, SMS, mobile phone calls and video conferencing) about any promotions, incentives and rewards offered by the Company/its partners.</p>	<p>Collection recording organising storing retrieving consulting</p>	<p>(a) Identity (b) Contact (c) Marketing</p>	<p>The Company relies on your consent as the legal basis for sending you marketing materials. Your consent to the Company processing information obtained through marketing can be withdrawn at any time¹⁹.</p>

¹⁸ **Note:** Legitimate interest assessment to be carried out for all processing that identifies legitimate interests as its legal basis.

¹⁹ **Note:** Irish e-privacy rules allow organisations to rely on:

- (i) opt out consent for (a) emails to individuals email addresses used for business purposes and (b) email/SMS marketing your own products to existing customers provided you have been in touch with them every 12 months and on each occasion (including when their data is collected) they are given an option to opt-out; and
- (ii) opt in consent is required for calls to mobile phones.

	using restricting		
<p>Customer Relationship and Business Management: Managing our relationship with you and administering and protect our business, property, our websites and Services by:</p> <p>(a) keeping our customer records up-to-date</p> <p>(b) notifying you about changes to our terms or privacy policy;</p> <p>(c) asking you to leave a review or take a survey;</p> <p>(d) responding to emails or messages you have sent us which are reasonable to expect a reply to and responding to complaints made by you about us, our websites and/or Services;</p> <p>(e) running webinars for customers and prospective customers;</p> <p>(f) maintaining the integrity of our IT and network security including troubleshooting, testing, system maintenance, support, reporting, hosting data;</p> <p>(g) using data analytics to (i) report on website visitors including demographics; (ii) study how customers (including those on trials) use our Services in order to make our Services more intuitive and better understand user preferences for the purposes of suggesting features which we believe customers would be interested in, and to target advertising on our</p>	<p>Collection</p> <p>recording</p> <p>organising</p> <p>structuring</p> <p>storing</p> <p>retrieving</p> <p>consulting</p> <p>using</p> <p>disclosing</p> <p>aligning or combining</p> <p>restricting</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e) Marketing</p> <p>(f) Customer Support</p>	<p>This processing is necessary for our legitimate interests to (i) study how customers use our Services in order to ensure our Services run optimally, and to promote those Services; (ii) inform our business development and marketing strategy including informing decisions on business reorganisation, group restructuring exercise or business transfer; (iii) maintain the integrity of our IT and network security and safety of our staff, customers and others; (iv) enforce and/or defend our rights under our Terms of Services and (v) prevent and address fraud, unauthorised use of [Company], violations of our Terms and policies, or other harmful or illegal activity.</p>

<p>website which is relevant to our customers' interests (iii) analyse our sales, including our conversion rate from trials to sales; (iv) determine if there is information about patterns, correlations and trends that may be useful to us or to our customers or partners, (v) keep our websites and Services up-to-date, relevant and secure, (vi) run quality assurance tests, (vii) determine who to issue direct marketing, plan customer engagement and assess leads qualification;</p> <p>(h) sharing and preserving information in the context of legal requests, litigation and other disputes;</p> <p>(i) managing our relationship with our suppliers; and</p> <p>(j) other activities necessary for the maintenance of our relationship with you and management of our business.</p>			
<p>EU and EU Member State Laws: To comply with obligations arising under EU or EU member state law²⁰.</p>	<p>Collection recording organising retrieving consulting</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing</p>	<p>Necessary to comply with the Company obligations arising under EU and EU Member State including (i) binding requests from regulatory bodies and law enforcement such as in relation to an information notice from the Data Protection Commission under the Data Protection Act 2018 or an investigation under the Criminal Justice (Miscellaneous Provisions) Act</p>

²⁰ **Note:** The DPC's WhatsApp decision held that where compliance with a legal obligation is identified as a legal basis the relevant statutory provision must be identified.

	<p>using disclosing</p>	<p>(f) Customer Support (g) Financial (h) Cookies (i) Profile (j) Technical</p>	<p>1997 (as amended) and (ii) taxation obligations such as our obligations under the Taxes Consolidation Act 1997. Please contact us at [INSERT EMAIL ADDRESS] if you want further information on the specific legal obligations which it is necessary for the Company to process your Data in connection with.</p>
<p>Job Applications: To consider any job applications.</p>	<p>Collection recording organising storing retrieving consulting using restricting</p>	<p>(a) Identity (b) Contact</p>	<p>Necessary for the Company's legitimate interests of hiring employees who satisfy the Company's professional requirements and are aligned with company values.</p>

[PRINT ON COMPANY HEADED PAPER]

Last updated: []

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[ANNEX]²¹

Purpose/Activity	Processing Operations	Personal Data	Lawful basis
<p>Service Provision: Providing of the Company’s Service to you including:</p> <p>(a) registering you as a new customer or authorised user of one of our customers;</p> <p>(b) assisting you in creating your account and in using your account across multiple devices;</p> <p>(c) administering subscriptions;</p> <p>(d) providing relevant information to you in connection with your use of our Services including transaction receipts, security alerts and support messages;</p> <p>(e) assisting you with using video conferencing services including making, receiving, joining and leaving video calls;</p> <p>(f) encrypting messages exchanged on our platform;</p> <p>(g) managing payments, fees and charges and collecting and recovering money owed to us; and</p> <p>(h) where applicable, providing customer support.</p>	<p>Collection recording organising storing retrieving consulting using restricting</p>	<p>(a) Identity (b) Contact (c) Financial (d) Customer Support (e) Technical (f) Usage</p>	<p>Where you are the Company’s customer, this processing is necessary for the performance of the Company’s Terms of Service with you.</p> <p>Where you are a representative of the Company’s customer this processing is necessary for its legitimate interests²² to enter into, perform and enforce our Terms of Service.</p>
<p>Marketing: Contacting you (by email, SMS, mobile phone calls and video conferencing) about any promotions, incentives and rewards offered by the Company/its partners.</p>	<p>Collection recording organising storing retrieving</p>	<p>(a) Identity (b) Contact (c) Marketing</p>	<p>The Company relies on your consent as the legal basis for sending you marketing materials. Your consent to the Company processing information obtained through marketing can be withdrawn at any time²³.</p>

²¹ **Note:** To be reviewed and it confirmed the extent to which the above processing is applicable to it.

²² **Note:** Legitimate interest assessment to be carried out for all processing that identifies legitimate interests as its legal basis.

²³ **Note:** Irish e-privacy rules allow organisations to rely on:

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<p>Customer Relationship and Business Management: Managing our relationship with you and administering and protect our business, property, our websites and Services by:</p> <p>(a) keeping our customer records up-to-date (b) notifying you about changes to our terms or privacy policy; (c) asking you to leave a review or take a survey; (d) responding to emails or messages you have sent us which are reasonable to expect a reply to and responding to complaints made by you about us, our websites and/or Services; (e) running webinars for customers and prospective customers; (f) maintaining the integrity of our IT and network security including troubleshooting, testing, system maintenance, support, reporting, hosting data; (g) using data analytics to (i) report on website visitors including demographics; (ii) study how customers (including those on trials) use our Services in order to make our Services more intuitive and better understand user preferences for the purposes of suggesting features which we believe customers would be interested in, and to target advertising on our website which is relevant to our</p>	<p>Collection recording organising structuring storing retrieving consulting using disclosing aligning combining restricting</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing (f) Customer Support</p> <p>or</p>	<p>This processing is necessary for our legitimate interests to (i) study how customers use our Services in order to ensure our Services run optimally, and to promote those Services; (ii) inform our business development and marketing strategy including informing decisions on business reorganisation, group restructuring exercise or business transfer; (iii) maintain the integrity of our IT and network security and safety of our staff, customers and others; (iv) enforce and/or defend our rights under our Terms of Services and (v) prevent and address fraud, unauthorised use of [Company], violations of our Terms and policies, or other harmful or illegal activity.</p>

- (iii) opt out consent for (a) emails to individuals email addresses used for business purposes and (b) email/SMS marketing your own products to existing customers provided you have been in touch with them every 12 months and on each occasion (including when their data is collected) they are given an option to opt-out; and
- (iv) opt in consent is required for calls to mobile phones.

<p>customers' interests (iii) analyse our sales, including our conversion rate from trials to sales; (iv) determine if there is information about patterns, correlations and trends that may be useful to us or to our customers or partners, (v) keep our websites and Services up-to-date, relevant and secure, (vi) run quality assurance tests, (vii) determine who to issue direct marketing, plan customer engagement and assess leads qualification;</p> <p>(h) sharing and preserving information in the context of legal requests, litigation and other disputes;</p> <p>(i) managing our relationship with our suppliers; and</p> <p>(j) other activities necessary for the maintenance of our relationship with you and management of our business.</p>			
<p>EU and EU Member State Laws: To comply with obligations arising under EU or EU member state law²⁴.</p>	<p>Collection recording organising retrieving consulting using disclosing</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing (f) Customer Support (g) Financial (h) Cookies (i) Profile (j) Technical</p>	<p>Necessary to comply with the Company obligations arising under EU and EU Member State including (i) binding requests from regulatory bodies and law enforcement such as in relation to an information notice from the Data Protection Commission under the Data Protection Act 2018 or an investigation under the Criminal Justice (Miscellaneous Provisions) Act 1997 (as amended) and (ii) taxation obligations such as our obligations under the Taxes Consolidation Act 1997. Please contact us at [INSERT EMAIL ADDRESS] if you want further information on the specific legal obligations which it is necessary for the Company to process your Data in connection with.</p>

²⁴ **Note:** The DPC's WhatsApp decision held that where compliance with a legal obligation is identified as a legal basis the relevant statutory provision must be identified.

Job Applications: To consider any job applications.	Collection recording organising storing retrieving consulting using restricting	(a) Identity (b) Contact	Necessary for the Company's legitimate interests of hiring employees who satisfy the Company's professional requirements and are aligned with company values.
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