

Data Protection Notice

Who are we?

We are **hedra Limited**, private owned company with directors **Maja Mumelas** and **Goran Mumelas**.

Our registered address is **8-9 Marino Mart, Fairview, Dublin 3, Dublin, D03 P590, Ireland**.

We provide **software development** and **company incorporation** services.

This notice sets out the basis on which any personal data we collect from you, or from others, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

What personal information do we collect from you?

We may collect a range of personal information from you, depending on your circumstances and the services you require. You may give us personal data by:

- Corresponding with us by phone, email or otherwise. We ask you to disclose only as much information as is necessary to provide you with our services or to submit a question, suggestion or comment in relation to our services.
- Attending meetings with us. These meetings might include the provision of personal data by you, or the filling in of forms required for us to provide a service to you.
- Filling in forms downloaded from our website and sending them to us electronically or by post.
- Visiting our website or social media channels, where applicable. If you wish to contact us using social media, please consult the privacy policy of the social media service provider for details on their privacy practices.
- Attending at an office where CCTV (Closed Circuit Television) is in operation.

In some cases, we may receive data from you that relates to another individual, for example, in a joint bank statement. In these cases, we will use the information purely for the purposes of the provision of services to you and we will not otherwise process the data.

What information about you do we obtain from others?

We do not need to collect data about you from others.

Why do we collect this information?

We collect the information in order to provide you with our services.

We may use this information:

- To contact you to arrange appointments
- To provide information and advise you generally
- To assess your circumstances and to recommend courses of action

The legal bases for the processing of your data are:

- That you have provided consent for the processing for the provision of our services
- Processing is necessary for compliance with a legal obligation to which we are subject

From time to time, we may also collect sensitive or 'special category' data in the provision of our services. The legal basis for the processing of your special category data is:

- That you have provided consent for the processing for the provision of our services

Who do we share this information with?

We will share your personal data with **Company Registration Office** and **Revenue** in order to provide you with our services.

In addition, we may disclose your personal information to third parties:

- If there is a risk of serious harm to you or to another person or to property
- If we are under a duty to disclose or share your information in order to comply with any legal obligation
- If we are required to give evidence in court
- To get legal advice or to defend a legal right
- In the event of a disclosure relating to child abuse

How long do we keep hold of your information?

The time periods for which we retain your information depends on the type of information and the purposes for which we use it. We will keep your information for no longer than is required or permitted.

In the case of Company Incorporation service, we will keep your information until your company is incorporated and registered on Revenue which will not exceed the period of 6 months.

In case of software development service, we will keep your information until the service is delivered and accepted by you.

Do we transfer your information outside the European Union or European Economic Area?

No.

What are your rights with respect to your personal data?

You have the following rights:

- The right to access the personal data we hold about you.
- The right to require us to rectify any inaccurate personal data about you without undue delay.
- The right to have us erase any personal data we hold about you in circumstances such as where it is no longer necessary for us to hold the personal data or, in some circumstances, if you have withdrawn your consent to the processing.

- The right to object to us processing personal data about you such as processing for profiling or direct marketing.
- The right to ask us to provide your personal data to you in a portable format or, where technically feasible, for us to port that personal data to another provider provided it does not result in a disclosure of personal data relating to other people.
- The right to request a restriction of the processing of your personal data.

Where our processing of your personal data is based on your consent to that processing, you have the right to withdraw that consent at any time but any processing that we have carried out before you withdrew your consent remains lawful.

You may exercise any of the above rights by contacting us electronically or through post.

You may lodge a complaint with your supervisory authority with respect to our processing of your personal data. The supervisory authority in Ireland is the Data Protection Commissioner. The website is www.dataprotection.ie.

What will happen if we change our Data Protection Notice?

This notice may change from time to time, and any changes will be posted on the www.hedra.ie website and will be effective when posted.

This notice was last updated on 21 January 2019.

How can you contact us?

You can contact us at gdpr@hedra.ie, or you can write to us to our registered company address stated at the beginning of this document.