

Privacy Policy Statement

Introduction

Traffico Limited is committed to protecting the privacy of your information in accordance with the principles set out in the General Data Protection Regulations (GDPR). This Privacy Policy Statement will inform as to how we look after your personal data when you visit our website and inform you about your privacy rights and how this law protects you.

Controller

Traffico Limited is the controller and responsible for your personal data.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the Traffico Limited using the details set out below.

Contact Details

Full name of legal entity: Traffico Limited

Email address: hello@traffico.ie

Postal address: 32 Manor Street, Stoneybatter, Dublin 7

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

Changes to The Privacy Policy and Your Duty to Inform Us of Changes

This version was last updated on 28 May 2021.

It is important that 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.

Third-Party Links

This website may include links to third-party websites. 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 notice of every website you visit.

The Data We Collect About You

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
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services you have instructed us to provide and your trading history.
- **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.
- **Usage Data** includes information about how you use our website, and professional services.

We do not collect any **Special Categories** of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

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). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

How Is Your Personal Data Collected

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you or your business:
 - make contact via the Enquiry Form on the Contact Us Page of our website
 - request phone contact via the Request a Callback Form on the Contact Us Page of our website
 - request marketing to be sent to you
 - give us feedback
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
 - other professionals such as architects, engineers and developers, based inside the EU;
 - analytics providers such as Google based outside the EU; and
 - search information providers based inside or outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside the EU.
- Identity and Contact Data from data brokers or aggregators based inside or outside the EU.
- Identity and Contact Data from publicly availability sources such as the Companies Registration Office and the Electoral Register based inside the EU.

Purposes for Which We Will Use Your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client	1. Identity 2. Contact	Performance of a contract with you
To process and deliver your instructions/order including: <ol style="list-style-type: none"> 1. Manage payments, fees and charges 2. Collect and recover money owed to us 	1. Identity 2. Contact 3. Financial 4. Transaction 5. Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (to operate or business/recover debts due to us)

<p>To manage our relationship with you which will include:</p> <ol style="list-style-type: none"> 1. Notifying you about changes to our terms or privacy notice 2. Asking you to leave a review 	<ol style="list-style-type: none"> 1. Identity 2. Contact 3. Profile 4. Marketing and Communications 5. Usage 	<p>Performance of a contract with you Necessary to comply with a legal obligation</p> <p>Necessary for our legitimate interests (to keep our records updated and to study how clients use our professional services)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ol style="list-style-type: none"> 1. Identity 2. Contact 3. Technical 	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>Necessary to comply with a legal obligation</p>
<p>To use data analytics to improve our website, professional services, marketing, client relationships and experiences</p>	<ol style="list-style-type: none"> 1. Technical 2. Usage 	<p>Necessary for our legitimate interests (to define types of clients for our professional services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<ol style="list-style-type: none"> 1. Identity 2. Contact 3. Technical 4. Usage 5. Profile 	<p>Necessary for our legitimate interests (to develop our professional services and grow our business)</p>

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing.

Third-Party Marketing

We will get your express opt-in consent before we share your personal data with any person outside of our company.

Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at hello@traffico.ie at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us which we are required to hold by law, or which is necessary for us to protect our legitimate interests.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of Your Personal Data

We may have to share your personal data with the categories of parties set out below for the purposes set out in the table in paragraph 5 above.

- External Third Parties including service providers, professional advisers and The Revenue Commissioners, regulators and other authorities based in the Republic of Ireland.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Retention

How Long Will You Use My Personal Data For?

By law we have to keep basic information about our clients (including Contact, Identity, Financial and Transaction Data) for six years after they cease being clients for tax purposes.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we 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.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular 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 we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain professional services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at hello@traffico.ie at any time.

No Fee Usually Required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What We May Need From You

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time Limit To Respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.