



# Sir Chat



## Sir Chat Privacy Policy

We take your privacy very seriously. This Privacy Policy applies to all visitors, users, and others who access the Sir Chat website or use our services.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the EU General Data Protection Regulation 2016/679 (EU GDPR) in relation to products and services we offer to individuals and our wider operations in the European Economic Area (EEA).

Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

### 1. Key Terms

It would be helpful to start by explaining some key terms used in this policy:

<b>We, us, our</b>	<b>8Bytes Development Limited</b> , a company incorporated in Ireland with registration number 523022 and headquartered at Willow Court, Chapel Road, Blacklion, Greystones, Wicklow, Ireland.
<b>Personal data</b>	Any information relating to an identified or identifiable individual as defined under GDPR
<b>Special category personal data</b>	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership; Genetic and biometric data (when processed to uniquely identify an individual); Data concerning health, sex life or sexual orientation, as defined under GDPR
<b>Data subject</b>	The individual who the personal data relates to, as defined under GDPR

### 2. Personal Data We Collect About You

We may collect and use the following personal data about you:

- (i) your name and contact information, including email address
- (ii) Information about how you use our website, IT, communication and other systems
- (iii) your responses to surveys, competitions and promotions

We may collect and use this personal data to provide services to you. If you do not provide personal data we ask for, it may delay or prevent us from providing our services to you. In some cases, you may provide personal data to us about other people. You must ensure that you have given those individuals appropriate notice that you are providing their information to us and have obtained their consent to that disclosure.

### 3. How Your Personal Data Is Collected

We collect most of this personal data directly from you either in person, by email, and via our Platform, website and related apps.

However, we may also collect information from other sources such as:

- (i) from a third party with your consent, e.g. our clients with whom you have registered to attend an event;
- (ii) from cookies on our website—for more information on our use of cookies, please see our cookie policy *insert link or directions where to find it, e.g. which is available on our website*]
- (iii) via our IT systems e.g. through automated monitoring of our websites and other technical systems, such as our computer networks and connections, communications systems, email and instant messaging systems;

### 4. How and Why We Use Your Personal Data

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- (i) where you have given consent;
- (ii) to comply with our legal and regulatory obligations;
- (iii) for the performance of a contract with you or to take steps at your request before entering into a contract; or
- (iv) for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

The table below explains what we may use your personal data for and why.

What we may use your personal data for	Our reasons
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Providing products and services to you	To perform our contract with you or to take steps at your request before entering into a contract
Preventing and detecting fraud against you or us	For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for you and/or us
Conducting checks to identify our customers and verify their identity and other activities necessary to comply with professional, legal and regulatory obligations that apply to our business	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for you and/or us To comply with our legal and regulatory obligations
Updating and enhancing customer records	To perform our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products
Marketing our services and those of selected third parties to: —existing and former customers —third parties who have previously expressed an interest in our services	For our legitimate interests or those of a third party, i.e. to promote our business and where you have given your consent as appropriate

Credit reference checks via external credit reference agencies	For our legitimate interests or those of a third party, i.e. to ensure our customers are likely to be able to pay for our products and services
External audits and quality checks, e.g. for ISO or equivalent accreditation and the audit of our accounts	For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations

Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, for example:

- (i) we have your explicit consent;
- (ii) the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent; or
- (iii) the processing is necessary to establish, exercise or defend legal claims.

## 5. Marketing

We may use your personal data to send you updates (through our application or by email, text message, telephone or post) about our products and services, including exclusive offers, promotions or new products and services.

We have a legitimate interest in using your personal data for marketing purposes (see above '**How and why we use your personal data**'). This means we do not usually need your consent to send you marketing information. However, where consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by contacting us or using the unsubscribe link in emails.

We may ask you to confirm or update your marketing preferences if you ask us to provide further products and services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never share it with other organisations outside of our group for marketing purposes.

## 6. Who We Share Your Personal Data With

We routinely share personal data with:

- (i) companies within our group;
- (ii) our clients and their customers where they are using our services where you have provided consent to such sharing as appropriate;

- (iii) third parties we use to help deliver our products and services to you, e.g. payment service providers;
- (iv) other third parties we use to help us run our business, e.g. marketing agencies or website hosts;
- (v) credit reference agencies;
- (vi) our insurers and brokers;
- (vii) our banks.

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

We may also need to:

- (i) share personal data with external auditors, e.g. in relation to ISO accreditation and the audit of our accounts;
- (ii) disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations;
- (iii) share some personal data with other parties, such as potential buyers of some or all of our business or during a restructuring—usually, information will be anonymised but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations.

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

## **7. Where Your Personal Data is Held**

Personal data may be held at our offices and those of our group companies, third party agencies, service providers, our clients, and representatives as described above (see above: '**Who we share your personal data with**').

Some of these third parties may be based outside the EEA/UK. For more information, including on how we safeguard your personal data when this happens, see below: '**Transferring your personal data out of the EEA/UK**'.

## **8. How Long Your Personal Data Will Be Kept**

We will keep your personal data while you have an account with us or we are providing products and services to you.

Thereafter, we will keep your personal data for as long as is necessary:

- (i) to respond to any questions, complaints or claims made by you or on your behalf;
- (ii) to show that we treated you fairly;
- (iii) to keep records required by law.

We will not keep your personal data for longer than necessary. Different retention periods apply for different types of personal data. When it is no longer necessary to keep your personal data, we will delete or anonymise it.

## **9. Transferring Your Personal Data out of the EEA and/or UK**

To deliver services to you, it is sometimes necessary for us to share your personal data outside the EEA/UK, e.g.:

- (i) with our offices or other companies within our group located outside the EEA/UK;
- (ii) with your and our service providers located outside the EEA/UK;
- (iii) if you are based outside the EEA/UK;
- (iv) where there is an international dimension to the services we are providing to you.

Under data protection law, we can only transfer your personal data to a country or international organisation outside the EEA/UK where:

- (i) the European Commission or the UK government has decided the particular country or international organisation ensures an adequate level of protection of personal data (known as an 'adequacy decision');
- (ii) there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects; or
- (iii) a specific exception applies under data protection law

These are explained below.

## Adequacy Decision

We may transfer your personal data to certain countries, on the basis of an adequacy decision. These currently include:

- (i) all European Union countries, plus Iceland, Liechtenstein and Norway (collectively known as the 'EEA');
- (ii) Gibraltar; and
- (iii) Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Switzerland and Uruguay.

The list of countries that benefit from adequacy decisions will change from time to time. We will always seek to rely on an adequacy decision, where one exists.

Other countries we are likely to transfer personal data to do not have the benefit of an adequacy decision. This does not necessarily mean they provide poor protection for personal data, but we must look at alternative grounds for transferring the personal data, such as ensuring appropriate safeguards are in place or relying on an exception, as explained below.

### Transfers with Appropriate Safeguards

Where there is no adequacy decision, we may transfer your personal data to another country if we are satisfied the transfer complies with data protection law, appropriate safeguards are in place, and enforceable rights and effective legal remedies are available for data subjects.

The safeguards will usually include using legally-approved standard data protection contract clauses

## 10. Your Rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data, in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party, in certain situations
To object	The right to object: <ul style="list-style-type: none"><li>- at any time to your personal data being processed for direct marketing (including profiling);</li><li>- in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests</li></ul>

Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
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For further information on each of those rights, including the circumstances in which they apply, please contact us (see '**How to contact us**' below).

If you would like to exercise any of those rights, please:

- (i) email or write to us—see below: 'How to contact us'; and
- (ii) provide enough information to identify yourself (e.g. your full name, address and customer or matter reference number) and any additional identity information we may reasonably request from you;
- (iii) let us know what right you want to exercise and the information to which your request relates.

#### **11. Keeping your personal data secure**

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

#### **12. How to complain**

Please contact us if you have any query or concern about our use of your information (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Data Protection Commissioner and they may be contacted at <https://www.dataprotection.ie/en/individuals>.

#### **13. Changes to this privacy policy**

This policy was published on 16/04/2024 and last updated on 16/04/2024. We may change this privacy notice from time to time—when we do we will inform you via our website.

#### **14. How to contact us**

You can contact us by email at [hello@8bytes.ie](mailto:hello@8bytes.ie).