



# Privacy Policy

This privacy policy is intended to inform the users of the website ([www.aodhanroberts.co.uk](http://www.aodhanroberts.co.uk)) about the type, scope and purpose of the collection and use of personal data by the website operator Aodhán Roberts [Sole Trader] (hereinafter, "Aodhán Roberts", "we", "us" or "our") in accordance with the General Data Protection Regulation (GDPR) and the UK's Data Protection Act (DPA).

We take data protection very seriously and treat your personal data confidentially and in accordance with the statutory provisions.

Please bear in mind that data transmission on the Internet can always be subject to security vulnerabilities. Full protection against access by third parties is thus not possible.

## **Name and address of the person responsible**

The responsible party within the meaning of the GDPR and the DPA is:

Aodhán Roberts [Sole Trader]  
[contact@aodhanroberts.co.uk](mailto:contact@aodhanroberts.co.uk)

The following provides you with an overview of the type of data collected and how it is used and passed on, the security measures Aodhán Roberts takes to protect your data and how you can exercise your rights.

## **Your Rights**

You have a number of 'Data Subject Rights' below is some information on what they are and how you can exercise them.

**Right to information:** You can request information from us as to whether and to what extent we process your data.

**Right to rectification:** If we process your data that is incomplete or incorrect, you can request that we correct or complete it at any time.

**Right to erasure:** You may request that we erase your data if we are processing it unlawfully or if the processing disproportionately interferes with your legitimate interests in protection. Please note that there may be reasons that prevent immediate deletion, e.g. in the case of legally regulated retention obligations. Irrespective of the exercise of your right to deletion, we will delete your data immediately and completely, insofar as there is no legal or statutory obligation to retain data in this respect.

**Right to restriction of processing:** You may request us to restrict the processing of your data if you dispute the accuracy of the data for a period of time that allows us to verify the accuracy of the data, the processing of the data is unlawful, but you object to erasure and request restriction of data use instead, we no longer need the data for the intended purpose, but you still need this data to assert or defend legal claims, or you have objected to the processing of the data.

**Right to data portability:** You may request that we provide you with the data you have provided to us in a structured, commonly used and machine-readable format and that you may transfer this data to another controller without hindrance from us, provided that we process this data on the basis of a revocable consent given by you or for the performance of a contract between us, and this processing is carried out with the aid of automated procedures. If technically feasible, you may request us to transfer your data directly to another controller.



# Privacy Policy

**Right to object:** If we process your data for legitimate interest, you may object to this data processing at any time; this would also apply to profiling based on these provisions. We will then no longer process your data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the assertion, exercise or defence of legal claims. You may object to the processing of your data for the purpose of direct marketing at any time without giving reasons.

**Right of complaint:** If you are of the opinion that we violate data protection law when processing your data, please contact us so that we can clarify any questions. Of course, you also have the right to contact the supervisory authority responsible for you, the respective state office for data protection supervision. If you wish to assert any of the aforementioned rights against us, please contact us. In case of doubt, we may request additional information to confirm your identity.

Where the processing of your personal information is based on consent, you have the right to withdraw that consent without detriment at any time.

The above rights may be limited in some circumstances, for example, if fulfilling your request would reveal personal information about another person, if you ask us to delete information which we are required to have by law, or if we have compelling legitimate interests to keep it. We will let you know if that is the case and will then only use your information for these purposes. You may also be unable to continue using our services if you want us to stop processing your personal information.

We encourage you to get in touch if you have any concerns with how we collect or use your personal information.

## Scope of the processing of personal data

As a matter of principle, we process personal data of our users only to the extent necessary to provide a functional website and our content and services. The processing of personal data of our users is regularly only carried out with the consent of the user. An exception applies in those cases in which it is not possible to obtain prior consent for actual reasons and the processing of the data is permitted by legal regulations.

## Legal basis for the processing of personal data

Insofar as we obtain the consent of the data subject for processing operations of personal data, Art. 6 para. 1 A. GDPR serves as the legal basis.

If the processing is necessary to protect a legitimate interest of our company and the interests, fundamental rights and freedoms of the data subject do not outweigh the first-mentioned interest, Art. 6 (1) F. GDPR serves as the legal basis for the processing.

## Data deletion and storage period

The personal data of the data subject will be deleted or blocked as soon as the purpose of the storage no longer applies. Storage may take place beyond this if this has been provided for by regulations, laws or other provisions to which Aodhán Roberts is subject. Data will also be blocked or deleted if a storage period prescribed by the aforementioned standards expires unless there is a necessity for the continued storage of the data for the conclusion or fulfilment of a contract.

## Provision of the website and creation of log files

Each time our website is accessed, our system automatically collects data and information from the computer system of the accessing computer.

The access logs of the web servers record which page calls have taken place at what time. They contain the following data:



# Privacy Policy

- IP
- Directory protection user
- Date
- Time
- Pages viewed
- Logs
- Status code
- Amount of data
- Referer URL (i.e. the previously visited page)
- user agent
- called host name

The IP addresses are stored anonymously by technical means. For this purpose, the last three digits are removed, i.e. 127.0.0.1 becomes 127.0.0.\*. IPv6 addresses are also anonymised. Therefore, it is no longer possible to assign the data to the calling user. The data is not stored together with other personal data of the user. The legal basis for the temporary storage of the data and the log files is Art. 6 para. 1 f. GDPR.

The temporary storage of the IP address by the system is necessary to enable delivery of the website to the user's computer. For this purpose, the user's IP address must remain stored for the duration of the session.

The storage in log files is done to ensure the functionality of the website. In addition, we use the data to optimise the website and to ensure the security of our information technology systems. An evaluation of the data for marketing purposes does not take place in this context. These purposes are also our legitimate interest in data processing according to Art. 6 para. 1 f. GDPR.

The anonymised IP addresses are stored for 60 days. Details of the directory protection user used are anonymised after one day.

Error logs, which record faulty page views, are deleted after seven days. In addition to the error messages, these contain the accessing IP address and, depending on the error, the web site accessed.

Accesses via FTP are logged anonymously and stored for 60 days. It is not possible to determine the storage period individually.

The collection of data for the provision of the website and the storage of the data in log files is absolutely necessary for the operation of the website. Consequently, there is no possibility for the user to object.

## Newsletter

On our website, it is possible to subscribe to a free newsletter via a link through a third-party provider. When registering for the newsletter, the data from the input mask is only transmitted to this third-party provider. Your consent is obtained by the third-party provider as part of the registration process. The privacy policy of the third party provider applies here.

It is possible to contact us via the e-mail address provided. In this case, the user's personal data transmitted with the e-mail will be stored.

In this context, the data is not passed on to third parties. The data is used exclusively for processing the conversation.



# Privacy Policy

The legal basis for the processing of data transmitted in the course of sending an e-mail is Art. 6 para. 1 f. GDPR. If the e-mail contact aims at the conclusion of a contract, the additional legal basis for the processing is Art. 6 para. 1 b. GDPR.

In the case of contact by e-mail, this also constitutes the necessary legitimate interest in processing the data.

The data will be deleted as soon as they are no longer required to achieve the purpose for which they were collected. For personal data sent by e-mail, this is the case when the respective conversation with the user has ended. The conversation is ended when the circumstances indicate that the matter in question has been conclusively clarified.

The additional personal data collected during the sending process will be deleted at the latest after a period of seven days.

The user has the possibility to revoke his consent to the processing of personal data at any time. If the user contacts us by e-mail, he can object to the storage of his personal data at any time. In such a case, the conversation cannot be continued. All personal data stored in the course of contacting us will be deleted in this case.

## **Contacting Us**

If you contact us the data you provide will be stored so that your message can be forwarded to the correct contact person. This is done in accordance with Article 6 lit. f) GDPR to process your request. Your data provided will not be used for any other purposes, in particular not for advertising.

## **Links to social media platforms**

Our website links to various social media platforms. We would like to point out that by clicking on these links you leave our website and also the scope of this privacy policy. On the social media platforms, the respective privacy policies of the operator of the social media platform apply exclusively.

## **Data retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, the data processed by us will be deleted or restricted in their processing in accordance with Art. 17 and 18 GDPR. If the data is not deleted because they are required for other and legally permissible purposes, their processing is restricted. This means that the data is blocked and not processed for other purposes. This applies, for example, to data that must be retained for commercial or tax law reasons.

## **When do we disclose your Personal Data?**

We may share your information with organisations that help us provide the services described in this policy and who may process such data on our behalf and in accordance with this policy, to support our online offer and our services. If you wish to learn more about how the relevant provider process your personal data, please follow the link embedded in the above-mentioned providers name.

Typically, and unless otherwise stated in this policy, data may be shared on the basis of our contractual and pre-contractual obligations, in accordance with Art. 6 para. 1 lit. b) GDPR. Equally, if you have consented to it, or where there we have a legal obligation to do so or on the basis of our legitimate interests (e.g. when using agents, hosting providers, tax, business and legal advisors, customer care, accounting, billing and similar services that allow us to perform our contractual obligations, administrative tasks and duties efficiently and effectively).

If we commission third parties to process data on the basis of a so-called "processing agreement", this is done on the basis of Art. 28 GDPR.



# Privacy Policy

In relation to meta data obtained about you, we may share a cookie identifier and IP data with analytic service providers to assist us in the improvement and optimisation of our website which is subject to our Cookies Policy.

We may also disclose information in other circumstances such as when you agree to it or if the law, a Court order, a legal obligation or regulatory authority ask us to. If the purpose is the prevention of fraud or crime or if it is necessary to protect and defend our right, property or personal safety of our staff, the website and its users.

## **Integration Of Services And Contents Of Third Parties**

We use within our online offer on the basis of our legitimate interests (Art. 6 para. 1 lit. f. GDPR), content or services offered by third-party providers in order to integrate their content and services.

This always requires that the third-party providers of this content are aware of your IP address, since the content or service could not send to your browser without the IP address. The IP address is thus required for the display of this content and we endeavor to use providers that only use your IP address for the delivery of the content or services. However, Third-party providers may also use so-called pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. The "pixel tags" can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user's device and may contain, among other things, technical information about the browser and operating system, referring websites, time of visit and other information about the use of our online offer, as well as be linked to such information from other sources.

## **Children Data**

Our website is not intended for children and we do not knowingly collect data relating to children. If you become aware that your Child has provided us with Personal Data, without parental consent, please contact us and we take the necessary steps to remove that information from our server.

## **Hosting**

The services for hosting and displaying the website are partly provided by our service providers as part of processing on our behalf. Unless otherwise explained in this privacy policy, all access data and all data collected in forms provided for this purpose on this website are processed on their servers. If you have any questions about our service providers and the basis of our relationship with them, please contact them as described in this privacy policy.

## **Content Delivery Network**

For the purpose of a shorter loading time, we use a so-called Content Delivery Network ("CDN") for some offers. With this service, content, e.g. large media files, are delivered via regionally distributed servers of external CDN service providers. Therefore, access data is processed on the servers of the service providers. Our service providers work for us within the framework of order processing. If you have any questions about our service providers and the basis of our cooperation with them, please use the contact option described in this privacy policy.

## **Data Breaches and Notification**

Databases or data sets that include Personal Data may be breached inadvertently or through wrongful intrusion. Upon becoming aware of a data breach, we will notify all affected individuals whose Personal Data may have been compromised, and the notice will be accompanied by a description of action being taken to reconcile any damage as a result of the data breach. Notices will be provided as expeditiously as possible after which the breach was discovered.

## **Confirmation of Confidentiality**

All company employees must maintain the confidentiality of Personal Data as well as company proprietary data to which they may have access and understand that that such Personal Data is to be restricted to only those with



## Privacy Policy

a business need to know. Employees with ongoing access to such data will sign acknowledgement reminders annually attesting to their understanding of this requirement.

### **Changes**

This policy and our commitment to protecting the privacy of your personal data can result in changes to this policy. Please regularly review this policy to keep up to date with any changes.

### **Queries and Complaints**

Any comments or queries on this policy should be directed to us. If you believe that we have not complied with this policy or acted otherwise than in accordance with data protection law, then please contact us.

We would like to point out that data transmission on the Internet (e.g. communication by e-mail) can have security gaps. Complete protection of data against access by third parties is not possible.

This privacy policy is valid as of July 2021