

# **Privacy Policy**

At MindaClient, we are committed to protecting your privacy and security. Please read our Privacy Policy carefully so that you are aware of the steps we take to protect your privacy, what information we collect and how we use it now or may use it in the future. MindaClient is a trading name of DKI Limited and any reference to MindaClient in this document shall be construed as referring to DKI Limited.

#### **Controllers of Information**

Any personal information provided to or gathered by https://www.mindaclient.com is controlled by MindaClient, Registered Office 11 Patrick Street, Kilkenny, Ireland

### What Information do we collect and why do we need it?

If you complete the registration form on the MindaClient website, or if (at your request) an account is created by us on your behalf, then in the course of us providing you with this service, it will be necessary for us to know your name, address, e-mail address, and phone number. The purpose of this is to allow us to communicate with you in the course of us providing you with pre-arranged services, and to contact you whenever necessary to keep you informed of any critical updates, important developments or interruptions of services. If you elect to pay your MindaClient subscription by credit card, you will need to provide us with your credit card information so that we can facilitate processing the payments for you.

Our web server records the IP address of the internet connection you use to connect to our server. This information is obtained for security purposes only, and these logs are never shared with a third party.

Apart from the personal data mentioned above, you will not be obliged to provide any additional personal information to us.

If you sign up to our newsletter it will be necessary for us to know your name and email address for the purpose of sending out our regular newsletter to you.

### What do we do with your data

When you register on the website or as a MindaClient customer and choose to receive further information from us, we may use the information you provide us with for the following purposes:

• We may contact you occasionally by telephone if this becomes necessary in order in the course of us continuing to provide you with a pre-arranged service

- We may contact you occasionally by electronic means (either email or SMS message). This might be to inform you of an important change to existing services, or to let you know about a new service that might be relevant to you.
- We monitor customer traffic patterns and site usage to help us to develop the design and layout of the website.
- MindaClient will not put any information about you on general release nor will it sell such information to organisations not associated with the MindaClient.

## Third party contractors within the EU

We employ other companies and individuals who operate within the EU to perform functions on our behalf such as delivering SMS messages, analysing data, processing credit card payments and operating our web servers. Such companies have access to your personal information for the purpose of carrying out this work only. These enterprises will not use your data for any other purpose. Under no circumstances will these enterprises use any additional data about you to which they are party for any other purposes. These suppliers will never transfer your data outside the EU.

## Third party contractors outside the EU

Our accountancy software is provided by Xero. They are based in New Zealand, and are fully GDPR compliant. For invoicing purposes, we store the name and email address of our clients with them. In the case that a client's home address is used as a business address, we also store this information with Xero.

Our mailing list service is provided by Mailchimp. They are US based, and are also fully GDPR compliant. We store email addresses and in some cases client names with Mailchimp.

#### **Cookies**

#### **EU Cookie directive**

From 26 May 2011 a new European Union directive requires us to gain the consent of our users to download cookies from our website onto their computer or mobile device. All MindaClient users are shown a clear message on our website explaining that we do use cookies. This message will continue to be displayed on each page of the website until the user disables the message by accepting the cookie usage.

#### How to disable cookies

You can stop cookies being downloaded on to your computer by selecting the appropriate settings on your browser. However please note that if you do this you may not be able to use the full functionality of this website.

There are links on our Terms and Conditions and Security pages which are in the footer of every web page pointing to this information.

## **Website Analytics**

MindaClient uses Google Analytics, a web analytics service provided by Google. Google Analytics collects first party cookies, which are text files placed on your computer to collect standard internet log information and visitor behaviour. This information is sent to Google and is used to evaluate how our website is being used. This enables MindaClient to compile statistical reports. A full list of cookies used by Google Analytics and explanations on how these work are available on the Google code website.

MindaClient does not collect (nor allow any third party to collect) personally identifiable information of visitors to our site. We will not associate any data gathered with any personally identifying information. We will not link or seek to link an IP address with the identity of a computer user. In short, Google Analytics doesn't identify who you are, but it does track your movements on our websites.

#### Retention

We retain your personal data for so long as is necessary regarding the purposes for which it was collected or otherwise lawfully processed, or for so long as may be necessary considering our legal obligations.

### **Rectification of personal data**

If you think that your personal data is not accurate or relevant you can contact us either by writing to us at our registered office, or by sending an email to support@mindaclient.com. You should set out clearly the personal data involved and the reasons why you consider it to be inaccurate and or irrelevant. We will amend the data within 30 days or explain to you why we will not do so. There is no fee for this service.

## Erasure of personal data

If you would like to have your personal data deleted, then you can make this request to us either by writing to us at our registered office, or by sending an email to support@mindaclient.com. Your right to have your personal data erased is dependent on the fact that the information is no longer necessary in relation to the purposes that they were collected. We will either erase your personal data from our records or explain to you why we will not do so within 30 days. There is no fee for this service.

### Objecting to processing

You have the right to obtain restriction of processing of your personal data. You can make this request to us either by writing to us at our registered office, or by sending an email to support@mindaclient.com. We will cease processing your data unless there are compelling grounds for the processing, which override the interests, rights and freedoms of the individual or the processing is

for the establishment or defence of legal claims. We will response to any request within 30 days. There is no fee for this service.

# **Data portability**

Upon request, we will provide to you a copy of your personal data as a digital CSV file. This request will be processed within 30 days of us receiving the request.

The right to lodge a complaint with the Data Protection Commissioner

If you feel that MindaClient are not meeting our obligations under the current data protection legislation, you may complain to the Data Commissioner at www.dataprotection.ie. The Data Commissioner will inform you of the outcome of your complaint.

### **Automated decision making**

MindaClient does not use automated decision-making software for data profiling or for any other purpose.

### **Changes to our Privacy Policy**

This is a live document, under regular review. This policy was last update in April 2018

### **Contact us**

If you have any queries about this Policy, would like to access or update your information, opt-out of marketing communications from us, or contact us about this Policy or our privacy practices, you may do so by submitting your request in writing to us at the following address:

MindaClient, 11 Patrick Street, Kilkenny, Co. Kilkenny.