Privacy Policy

This Privacy Policy is effective as and from the 19th June 2023.

Introduction

Your privacy is important to Daring Boys and Girls Limited and we are committed to protecting your personal data and keeping your personal information safe. This privacy policy outlines our approach to compliance with the General Data Protection Regulation ("GDPR") and all other relevant data-protection legislation. It also sets out your privacy rights and how the law protects you.

Changes to this privacy policy

We may update this Privacy Policy from time to time. If we make any material changes, we will notify you prior to the changes taking effect by posting a notice on our website and, where appropriate, sending you a notification.

1. Important Information and who we are

Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how Daring Boys and Girls Limited collects and processes your personal data through your use of this website.

Who we are and how to contact us

Throughout this privacy policy, "we" "us" and "ours" refers to Boys and Girls Limited. Daring Boys and Girls Limited are registered in Ireland under company number 473842 and have our registered office at Bloomfield House, Bloomfield Avenue, Portobello, Dublin 8. To contact us, please email newbusiness@boysandgirls.ie or telephone on +353 1 402 0220.

2. Information we collect and how we use it

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, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes, email address and telephone numbers.
- 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.
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

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.

3. 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;
 - o request marketing to be sent to you;
 - o give us feedback or contact us.
- Automated technologies or interactions. As you interact with our website, we will 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. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy <u>link</u> for further details.

4. How we use your personal data

We will only use your data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data.

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.

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. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

]	Purpose/Activity	Type of data	Lawful basis for processing
			including basis of legitimate
			interest

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) 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) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

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. For more information about the cookies we use, please see link to your cookie policy.

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.

5. Disclosures of your personal data

We may share your personal data with the parties for a number of reasons as outlined below. we do not sell your personal data to anyone and only share it with third parties who are working on our behalf. We require that our any third parties protect such information from unauthorised access, use, and disclosure.

Third-party service providers

We may share your personal information with third-party service providers which perform services and functions at our direction and on our behalf such as our accountants, IT service providers,

printers, payment providers, lawyers, providers of security and administration services and other business advisers.

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.

6. International Transfers

We may transfer your personal data outside the European Economic Area (EEA). These countries do not always afford an equivalent level of privacy protection and in such circumstances, we take specific steps, in accordance with data protection law to protect your personal information. In particular, for transfers of personal data outside the EEA we rely either on an adequacy decision by the European Commission or on contractual protection approved by the European Commission.

7. Data storage and retention

We will retain your personal information as needed to fulfil the purposes for which it was collected. We will retain and use your personal information no longer than is necessary to comply with our business and legal obligations. Where we enter into a legal contract with you, we will hold your personal information for a period of seven years from the date of completion of this contract by reference to the statute of limitation for a legal claim under contract.

8. Your legal rights

You have several rights under data-protection law in relation to how we use your personal information. You have the right, free of charge, to:

- Request a copy of the personal information we hold about you in a structured, commonly used and machine-readable format
- Rectify any inaccurate personal information we hold about you
- Withdraw your consent where we have relied upon your consent to process your information
- Erase the personal information we hold about you subject to certain exceptions
- If technically feasible, have your personal information transmitted to another data controller in a machine-readable format at your request
- Restrict processing of your personal information in certain circumstances
- Object to our use of your personal information for our legitimate interests, for profiling and for direct marketing purposes
- Not be subject to a decision which is based solely on automated processing where that decision produces a legal effect on you or otherwise significantly affects you. We do not make automated decisions of this nature
- Lodge a complaint with the appropriate data-protection authority if you have concerns about how we process your personal data

These rights are in some circumstances limited by data-protection legislation. If you wish to exercise any of these rights please contact us at newbusiness@boysandgirls.ie. We will take measures to verify your identify which we will do by reference to copies of acceptable identification documentation supplied by you.

We will endeavour to respond to your request within a month. If we are unable to deal with your request within a month we may extend this period by a further two months and we will contact you and explain why.