

Privacy Policy

Welcome to Subtoco's Privacy Policy.

1. Important Information and Who We Are

Purpose of this Document

Subtoco ("we," "us," or "our") is committed to protecting the privacy and security of personal information. This privacy policy outlines how we collect, use, and process personal data about individuals and business representatives who use our services or interact with us.

This privacy policy applies to:

- Individual clients.
- Business clients, including their representatives such as employees, directors, and contractors.

It supplements any other privacy notices we may provide on specific occasions and is not intended to override them.

Controller

Subtoco (Company Registration Number: 759040) is the controller of personal data collected and processed. Our registered office is at 42 Ballydowd Grove, Lucan, Co. Dublin, K78 X6V0. We are responsible for deciding how personal information is held and used in accordance with applicable laws, including the Data Protection Acts 1988-2018 and the General Data Protection Regulation (GDPR).

Third-Party Links

Our website and communications may include links to third-party websites. Clicking on these links may allow third parties to collect or share data about you. We encourage you to read the privacy notices of those websites.

2. The Data We Collect

We collect personal data about individual clients and business representatives to deliver services, manage contracts, and maintain effective communication.

Categories of Personal Data

For Individuals:

- Identity Data: Name, title.
- Contact Data: Address, personal email, and telephone numbers.
- Financial Data: Bank account details, debit or credit card information.
- Transaction Data: Billing history, details of products and services used.

For Businesses:

- Identity Data: Name, job title, and professional contact details (e.g., business email, phone number).
- Company Data: Business name, address, VAT number, company registration details.
- Financial Data: Business bank account details, invoicing details.
- Transaction Data: Records of interactions, contracts, and billing.

We do not collect special categories of personal data (e.g., health data, race, or religious beliefs).

3. How We Collect Data

We collect data through:

- **Direct Interactions:** When clients or business representatives contact us, use our website, communicate by email, or enter into contracts.
 - **Third Parties and Public Sources:** From credit reference agencies, business directories, or referrals.
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4. How We Use Your Data

We process personal data for the following purposes, with lawful bases as specified:

Purpose/Activity	Type of Data	Lawful Basis for Processing
To provide and deliver our products and services.	Identity, Contact, Financial	Performance of a contract with you or your business.
To manage payments, fees, and charges.	Identity, Contact, Financial	Performance of a contract; Legitimate interests (to recover debts).
To maintain business relationships and communication.	Identity, Contact, Company	Legitimate interests (managing client accounts, responding to inquiries).
To prevent fraud and manage security.	Identity, Financial, Transaction	Legitimate interests (to protect our business and clients); Compliance with legal obligations.
To provide marketing tailored to business needs.	Identity, Contact, Company	Legitimate interests (promoting our services to relevant business contacts).

Marketing

We may send promotional communications to business representatives using their professional contact details unless they opt out. You can opt out at any time by contacting us or using the "unsubscribe" link in our communications.

5. Data Sharing

We may share your data with:

- **Service Providers:** E.g., IT support, payment processors like Stripe.
- **Regulatory Authorities:** When required to comply with legal obligations.
- **Business Partners:** For contract fulfilment or collaboration.

All third parties must respect the confidentiality and security of your data.

6. International Data Transfers

If personal data is transferred outside the EU, we ensure equivalent protection through appropriate safeguards, such as standard contractual clauses or reliance on privacy frameworks.

7. Data Security

We implement security measures to protect your data from unauthorised access, loss, or misuse. Access is restricted to employees, agents, or third parties with a business need, subject to confidentiality obligations.

8. Data Retention

We retain personal data for as long as necessary to fulfil the purposes outlined in this policy, including legal, accounting, and reporting requirements. For example:

- Basic client data: Retained for six years for tax purposes.
 - Contract data: Retained for the duration of the business relationship and as required by law.
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9. Your Data Rights

Business representatives have the right to:

- Access their data.
- Request corrections or updates.
- Object to processing based on legitimate interests.
- Request erasure of personal data where appropriate.

- Opt out of marketing communications.

To exercise your rights, contact our Data Protection Officer at **info@subtoco.com**.

10. Automated Decision-Making

We do not use automated decision-making to process business-related data unless explicitly stated and agreed upon.

11. Changes to This Policy

This policy may be updated periodically. Substantial changes will be communicated via email or on our website.

For any queries or to access older versions of this policy, contact **info@subtoco.com**.