### Who we are

We are Grafton Digital, a web & app development and design company in Ireland. Our websites addresses are:

Graftondigital.com and graftondigital.ie

## What this is:

This is our GDPR compliance and privacy policy statement. This document is copyrighted. Duplication or adaptation from this document below cannot be found on any other website without the consent of Grafton Digital in writing. Therefore this document is not a source of inspiration for other companies or websites. No one can sell this other than us. This is our personal tailored privacy policy continued as part 2 and our General Data Protection Regulation statement.

# **Policy Scope**

This Privacy & Compliance Policy (Policy) sets forth Grafton Digital's privacy practices regarding the collection and use of personal data relating to the Grafton Digital websites named as www.mediaproweb.ie and www.mediaprowebdesign.ie We are dedicated to treating people with respect, transparency and integrity; therefore, we don't sell or lease your personal data to any third party. Grafton Digital adheres to privacy best practices, including the Data Protection Acts 1988 and 2002 & the General Data Protection Regulation (GDPR) that complies with international personal data transfer framework requirements of 25th of May 2018.

Grafton Digital recognizes that respecting user privacy over The Internet is of utmost importance to you and we fully comply with our obligations under the Data Protection Acts 1988 and 2002 & GDPR. This privacy statement is designed to provide information about the privacy, compliance and data collection practices of <u>GDPR SERVICES GALWAY</u> for the site www.graftondigital.com and www.graftondigital.ie

If you have questions or concerns about our website and this Policy, please contact us through any of the following means:

hello@graftondigital.com hello@graftondigital.ie

Phone: 091435232

### Information identification

Personal data is data that can be used to identify or contact you, such as your name, email address, telephone number or similar information. Grafton Digital does not keep or collects personal data you voluntarily give us, such as but not limited to, requesting information via our website through our 'Contact Us' page. Emails tend to be kept on our secure workstation as a copy/mirror of our personal email server, stored either in Siteground or Pulsant. We also collect information about your interactions with our website and applications (e.g., browsing behaviour). Our website automatically tracks certain behaviour (Usage Data) during visits, such as referring/exit URLs and we also collect other basic information about you which does not directly identify you, however, which may correspond with you. We use this information to learn more about how our website is used and to otherwise improve and administer the site. We also use this information to enable us to deliver information tailored to your interests and preferences, based on your use of the website. We use certain information about individuals (who have voluntarily provided it to us through our 'Contact Us' page) in order to contact them about their challenges and our services and how we can help them. We also collect information to better understand how visitors use this website and to

present timely, relevant information to them. In general, you can visit the website without telling us who you are or providing any information about yourself through our 'Contact us' page. In these instances, Grafton Digital will ask for your name and/or company name, email address, contact number and other appropriate information needed to respond to a query or provide you with specific services.

Collecting this data helps us understand what you are looking for from the organisation, enabling us to deliver improved, tailored services.

# Specifically, we may use your data:

- To contact you in response to a specific enquiry
- To send you an email about our services and how we can help you (after you have contacted us through our 'Contact Us' page)
- To improve the services we provide
- To customise the website for you

#### Note:

Like most websites, we gather information on an aggregate basis of all visitors to our website. This non-personal data comprises of information that cannot be used to identify or contact you, such as demographic information regarding, for example, browser types and other anonymous statistical data involving the use of our website.

## What we do with your information

Nothing. We will never lease, distribute or sell your personal information to third parties unless the law requires us to. Any personal information we hold about you is stored and processed under the Data Protection Act 1998, 2002 and GDPR. We will always hold your information securely on our server(if any is being stored.) We operate our website via HTTPS protocols for extra safety.

To prevent unauthorised disclosure or access to your information, we have implemented strong physical and electronic security safeguards. Our websites raise alarms/flags when any modification occurs without our design team's input.

# For example:

An email is sent to the webmaster if someone tries to breach the access to the website. We also follow stringent procedures to ensure we work with all personal data in line with the Data Protection Act 1998, 2002 and GDPR.

However, there is a certain circumstance where we may share your personal data without additional notice to you and that is to our IT Contractor to enhance and improve our website, who too has GDPR Compliance measures in place.

## Links to third parties

Other Internet sites and services have separate privacy and data collection practices. Once you leave our websites URL's Grafton Digital cannot control and has no responsibility for the privacy policies or data collection activities of other websites. Our website may contain links to other websites. Please note that we have no control over these links to other websites either. If you provide information to a website to which we are linked to, we are not responsible for its protection and privacy. Always be vigilant when submitting data to websites. Read the respective website's policies fully.

## What personal data we collect and why we collect it

Just cookies and email on orders. Order related data. All orders are deleted on completion. Also, we do not store an email database or customer details. We are a small company so we can commit to memory everyone that works with us.

#### Comments

When visitors leave comments on the site we collect the data shown in the comments form, and also the visitor's IP address and browser user agent string to help spam detection. However, only active customers can post comments. That means they will accept their email to be part of our website forums.

An anonymised string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available here: https://automattic.com/privacy/. After approval of your comment, your profile picture is visible to the public in the context of your comment.

### Media

If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.

#### **Contact forms**

Our contact forms do not store the details completed. We just get 1 email with the content of your communication.

#### Cookies

If you leave a comment on our site you may opt-in to save your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

Cookies are small text files sent from a website and stored in the user's web browser while the user is browsing a website. When users visit the same website again, the browser sends cookies back to the website allowing the website to recognise the user and remember things like personalised details or preferences.

If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

We may use cookies to:

Analyse our web traffic using an analytics package.

- Identify whether you are signed in to our website.
- Test content on our website.
- Store information about your preferences.
- To recognise when you return to our website.

Cookies do not provide us with access to your computer or any information about you, other than that which you choose to share with us through our 'Contact Us' page. More information about cookies and details of how to manage or disable them and to learn more about cookies and how they are used can be found on <a href="https://www.aboutcookies.org">www.aboutcookies.org</a>.

We may use a feature on your web browser to send your computer a "cookie". We do not use cookies to retrieve any personal information from your computer. We only use cookies to learn ways to enhance our website and to give you a personalised service whilst using our website.

Our website will have information posted about cookies and when a cookie will be uploaded to your computer.

Grafton Digital and our hosting partners use a variety of technologies to facilitate the delivery of services to you through our website and to understand and preserve your personal preferences. Use of these is governed by our Policy or the policy of the third party providing the service.

## Which Cookies do we use?

When you use our websites the following types of cookies can be set on your device:

If you leave a comment on our site you may opt-in to save your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

You can use your website browser's cookie settings to determine how our website uses cookies. If you do not want our website to store cookies on your computer or device, you should set your website browser to refuse cookies. However, please note that doing this may affect how our website functions for you. Some pages and services may become unavailable to you. Unless you have changed your browser to refuse cookies, our website may issue cookies when you visit it.

Also, as you can see, we have tailored and offered you significant choices for management of what data is being used, int the tab menu option of the privacy policy compliance notice.

## **Updates to our Policy**

Grafton Digital may, in its sole discretion, occasionally review, revise and /or update this Policy by posting the amended Policy on this website. We will notify you prior to any significant changes, when and where required, or material Policy changes via your email address or by a website notice.

This Policy was last updated on Monday, May 28, 2018. We will not use your existing information in a manner not previously disclosed.

#### **Data Retention**

We retain your information while we are communicating with you, whether it be through email, telephone or by post or as needed to provide you with services. While your personal data is required we a safe and secure hosting environment to protect it. Our hosting company, LiquidNet LTD. Is storing all our documents and data in their secure Pulsant Datacenter in Scotland. This is a 24/7 supervised service and no attack is possible without attracting the attention of the engineers in the data centre. Usually in less than one month after you supply your information to our website through our 'Contact Us' page, it is deleted by us, and we tend to update extremely fast, to keep the websites extremely secured.

## **Security**

Grafton Digital takes personal data security seriously. We use reasonable and appropriate data protection measures, such as robust technologies, security policies and procedures, to reduce the risk of misuse, alteration, accidental destruction or loss and unauthorized disclosure or access to our systems and data. For example, we encrypt the transmission of sensitive information using 256kb Encryption. All passwords stored in our websites databased are MD5 encrypted. We follow **GDPR** and industry standards and best practices to protect your personal data during transmission and once we receive it. Unfortunately, no security method is 100% secure and we are aware that very skilled hackers or evildoers are out there, therefore, we cannot guarantee absolute security. However, we carry out every effort to keep your personal data that we have received from you through our 'Contact Us' page secure.

read more here on **GDPR Galway** 

## **Embedded content from other websites**

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracing your interaction with the embedded content if you have an account and are logged in to that website.

#### **Analytics**

We employ the services of Google Analytics to help us understand how our marketing efforts are successful and how are our websites being used.

## Who we share your data with

Google might track customer behaviour in their end, but we do not. We analyse in general how many visitors we had, so we know how to work on our marketing. No personal or individual data is processed, collected, tracked, stored or sold.

## How long we retain your data

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognise and approve any follow-up comments automatically instead of holding them in a moderation queue. We, in general, delete most comments as this is not really a forum. It is a company website. For more interaction visit our social media area.

For users that register on our website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

## What rights you have over your data

If you have an account on this site or have left comments, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes. We do track and record all attacks of any known type. At times, when we consider we gathered enough data, we may share our findings with the police.

## Where we send your data

Visitor comments may be checked through an automated spam detection service.

#### Your contact information

Please email us on these 2 addresses:

hello@graftondigital.com and hello@graftondigital.ie or call us directly on 091435232.

## How we protect your data

We are hosting the website in Pulsant, a data centre known to be very secure, in Scotland, UK. This is done via our <u>Irish Hosting</u> Partner.

## What data breach procedures we have in place

Since no personal data is being stored, we try to comply as much as we can with the hosting services and follow their data breach procedures. In case we lose any personal information, our policy is that we will announce the police about this and all of the users holding present data on the website will be notified of this occurance. Fully transparent. IT IS NEVER OUR WISH to disclose any data to any party.

## What third parties we receive data from

No third parties. are involved other than the hosting company, LiquidNet Itd operating Irish Hosting.

## What automated decision making and/or profiling we do with user data

No automated decisions or profiling occurrences are set.

## Industry regulatory disclosure requirements.

We are compliant with the new GDPR and cookie policies. Links to these are available on our website. Our GDPR Compliance Website document is created with the help of our <u>GDPR Galway Service</u>.

## NOTE OF THE TERMS AND CONDITIONS:

The work caried by Grafton DigitalDesign is not refundable once deposit is paid

### MORE ON GDPR AND PRIVACY POLICY

At Grafton Digital, accessible from mediaprowebdesign.ie, one of our main priorities is the privacy of our visitors. This Privacy Policy document contains types of information that is collected and recorded by Grafton Digital and how we use it.

If you have additional questions or require more information about our Privacy Policy, do not hesitate to contact us.

## **GENERAL DATA PROTECTION REGULATION (GDPR)**

We are a Data Controller of your information.

Grafton Digital legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Information we collect and the specific context in which we collect the information:

- Grafton Digital needs to perform a contract with you
- You have given Grafton Digital permission to do so
- Processing your personal information is in Grafton Digital legitimate interests
- Grafton Digital needs to comply with the law

Grafton Digitalwill retain your personal information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your information to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our policies.

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. If you wish to be informed what Personal Information we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the information we have on you.
- The right of rectification.
- The right to object.

- The right of restriction.
- The right to data portability
- The right to withdraw consent

## **LOG FILES**

Grafton Digital follows a standard procedure of using log files. These files log visitors when they visit websites. All hosting companies do this and a part of hosting services' analytics. The information collected by log files includes internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks. These are not linked to any information that is personally identifiable. The purpose of the information is for analyzing trends, administering the site, tracking users' movement on the website, and gathering demographic information.

#### **COOKIES AND WEB BEACONS**

Like any other website, Grafton Digital uses 'cookies'. These cookies are used to store information including visitors' preferences, and the pages on the website that the visitor accessed or visited. The information is used to optimize the users' experience by customizing our web page content based on visitors' browser type and/or other information.

For more general information on cookies, please read "What Are Cookies".

#### **PRIVACY POLICIES**

You may consult this list to find the Privacy Policy for each of the advertising partners of Grafton Digital.

Third-party ad servers or ad networks uses technologies like cookies, JavaScript, or Web Beacons that are used in their respective advertisements and links that appear on Grafton Digital, which are sent directly to users' browser. They automatically receive your IP address when this occurs. These technologies are used to measure the effectiveness of their advertising campaigns and/or to personalize the advertising content that you see on websites that you visit.

Note that Grafton Digital has no access to or control over these cookies that are used by third-party advertisers.

## THIRD PARTY PRIVACY POLICIES

Grafton Digital's Privacy Policy does not apply to other advertisers or websites. Thus, we are advising you to consult the respective Privacy Policies of these third-party ad servers for more detailed information. It may include their practices and instructions about how to optout of certain options.

You can choose to disable cookies through your individual browser options. To know more detailed information about cookie management with specific web browsers, it can be found at the browsers' respective websites.

#### CHILDREN'S INFORMATION

Another part of our priority is adding protection for children while using the internet. We encourage parents and guardians to observe, participate in, and/or monitor and guide their online activity.

Grafton Digital does not knowingly collect any Personal Identifiable Information from children under the age of 13. If you think that your child provided this kind of information on our website, we strongly encourage you to contact us immediately and we will do our best efforts to promptly remove such information from our records.

## **ONLINE PRIVACY POLICY ONLY**

Our Privacy Policy applies only to our online activities and is valid for visitors to our website with regards to the information that they shared and/or collect in Grafton Digital. This policy is not applicable to any information collected offline or via channels other than this website.

## **CONSENT**

By using our website, you hereby consent to our Privacy Policy and agree to its terms.