

DOMEFAVOUR PRIVACY POLICY

(Effective December 12TH, 2023)

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PLEASE READ THIS PRIVACY STATEMENT CAREFULLY

1. Introduction

Thank you for choosing the **Domefavour** services accessible at or **www.domefavour.ie** (the "Site"), operated by **Domefavour Limited**.

Domefavour is the owner and provider of an online platform, located at <https://www.domefavour.ie> (the "Platform"), for provision of ads posting services in connection between the User, Client, and/or Buyers. When this Policy mentions **Domefavour** or **Domefavour Limited**, it refers to "we", "us", or "our", and we will be acting as your Data Controller.

The User is a service provider and the Client or Buyer is an end-customer interested in the Services of a Classified Ad posted on the Platform.

Our privacy promises:

- a. We value your privacy & data security
- b. We do not use your data for commercial purpose
- c. We comply with the GDPR
- d. We will never sell your data
- e. You control your data.

In order to fully understand the consent you are giving us in relation to your personal data in Consent Section below. This policy will let you know:

- a. What personally identifiable information is collected from you
- b. How your information is used
- c. What cookies are and how they are used
- d. What cookies are and how they are used
- e. Who is collecting your information
- f. With whom your information may be shared
- g. What choices are available to you regarding collection, use, and distribution of your information
- h. How you can access, update or delete your information
- i. The kind of security precautions that are in place to protect the loss, misuse, or alteration of your information.

2. Your Consent

Our Privacy Policy is based on and reflects various mandatory requirements of applicable laws around the world, where Domefavour Limited is operating, that govern the protection of personal data, including but not limited to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the so called “General Data Protection Regulation” or “GDPR” as sometimes abbreviated). Under GDPR and certain other applicable laws, we are required to get specific consent from you in relation to the personal data we get from you.

The consent you are giving hereby relates to the personal data that was entered on your profile page at Domefavour Limited. The consent you are giving is a free, willful, clear and explicit consent to:

- a. process personal data for the purpose of providing, supporting and improving the services and features, using appropriate technical, administrative and organizational security measures as well as for the purposes set forth in the Terms;
- b. be subject to a decision by any user of Domefavour Limited or any Domefavour affiliate based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you;
- c. cross-border transfers of your personal data to those countries where Domefavour operates or may operate in future with the understanding that whilst the EU countries and a number of other countries have similar and appropriate rules and level of personal data safeguard and protection there may be transfers of your personal data to those countries that lack the appropriate level and legislative regulation of personal data safeguard and protection.

Please note that you have the right to withdraw your consent at any time by writing to us at contact@domefavour.ie with clear statement that you withdraw your consent and wish your account to be terminated and all personal data to be deleted. Notwithstanding, you are not obligated to provide us with your personal data completely or partially, however in that way we could not provide you with our services depending on provided personal data volume. If you opt out the processing of your personal data, we will respect that subject to our legal obligations.

3. Data Controller/Processor

Domefavour Limited, a company duly incorporated under the laws of the **Republic of Ireland**, bearing company registration number { }, with registered address at 77 Camden Street Lower Dublin - D02XE80 (hereinafter “Domefavour”, “us”, “we”, or “our”), is responsible for the

collection of personal data via the independentanalytics and jetpack CRM available on the www.domefavour.ie/, (“our site”).

When this Policy mentions Domefavour it refers to your Data Controller. Our data privacy officer may be contacted at contact@domefavour.ie. In relation to your personal data when you are registered as an individual Domefavour acts as a controller whereby for certain users who are mainly legal entities Domefavour may act as a processor.

4. General Information

The terms “We”, “Us”, “Our” mean **Domefavour**. The terms “You” and “Your” refer to You, as a user, client, service provider, buyer or visitor of our website provided Services. The term “personal data” refers to all information relating to an identified or identifiable natural person (hereinafter referred to as “data subject”); an identifiable natural person is one who can be identified directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more specific characteristics expressing the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person, as set out in the GDPR. In addition, personal data comprises data of legal persons.

5. Cookies Policy

Cookies are small blocks of data, which are sent from a website and stored on user’s device by a web server. These blocks of data contain information about your surfing activity on the Service. Cookies help to remember stateful information (like Ad Submitted and Service Provided) or to track the user's browsing activity.

We use cookies in case to ensure the best experience for everyone while using Domefavour Limited. Without cookies we would not provide you such experience. You may update your cookie preferences at the Domefavour website footer by clicking on «Cookie Preferences».

6. Personal Data Collection

When you visit our website, and decide to use our service. You will be required to create an account. There is some mandatory information that you are always giving us as a starter to get registered on Domefavour Platform. You agree to provide only true and correct information. When you use and interact with our services. This information assists you in navigating the system by automatically filling in certain forms (such as the ad submission form) with your

information so that you don't have to continually re-enter it. Once you register you are no longer anonymous to **Domefavour** – you have a username and are able to take full advantage of the many offerings of Domefavour.

- a. name;
- b. surname / family name;
- c. email address;
- d. account type
- e. password.
- f. We may get your approximate location from your IP address.
- g. Usage Data: For instance, files uploaded, profile filled, ad submitted, etc. plus records of your user experience (full users' sessions).

Plus there are supplementary information you may wish to give us to expand your profile and use the most of Domefavour Limited namely:

- a. phone number;
- b. education, including the country where you graduated, degree received, graduation year and major;
- c. languages, including native language;
- d. work experience; skills;
- e. country of residency; time zone you are living in;
- f. photo;
- g. bank account details, credit or debit card details, etc;
- h. certificate of registration as a legal entity, plus a copy of your relevant certificates, or any other proof of experience.

7. Activity

When You use the Service, We receive and store certain information which may include Your Personal Information and anonymous information, regarding Your use of the Services. Examples include data about the computers and other electronic devices you use to access or use Domefavour Service, including IP addresses, browser type, language, operating system, the referring web page, pages visited, location and cookie information. We may use this data in a way that does not disclose any of Your personally identifiable information, including, but not limited to, for purposes of developing new product and service offerings.

8. How we use your Information and Legal Basis

Any processing of data requires a legal basis. If the processing is necessary for the performance of a contract to which the data subject is a party, or for the implementation of pre-contractual measures taken at the request of the data subject, the processing may be based on the GDPR. Our processing of personal data is necessary to safeguard our legitimate interests as a data controller. We process and use the information we collect in various ways, in addition, We may also collect, hold and use your personal information for:

- a) **Delivering our service:** We are able to deliver the services and features of Domefavour Platform to you and provide you, the user, with a customized experience and to assist your navigation throughout the Service.
- b) **To improve and develop Domefavour Limited:** We use the personal data we collect from you to improve the Platform and further develop it. For example, we use the information to troubleshoot and protect against errors; perform data analysis and testing; conduct research and surveys; and develop new features and services of Domefavour Service;
- c) **Communication:** We use your personal data when needed to send you notifications and updates and respond to you when you contact us. We also use your information to promote new features or services that we think you would be interested in. You can control marketing communications and most service notifications via the “Unsubscribe” link in the bottom of an email or in your account settings.
- d) **Data Security and fraud prevention:** We use the personal data we collect from you to promote the safety and security of Domefavour Service, our users, and other parties. For example, we may use the information to authenticate users, facilitate secure payments, protect against fraud and abuse, respond to a legal request or claim, conduct audits, and enforce our terms and policies.
- e) **Investigation:** Prevent and investigate unauthorised access to the Services, including other illegal activities;
- f) **Legal Obligation:** Comply with specific legal obligations, and enforcing our agreements.

We also process data that cannot be assigned to any person. These are data that do not personally identify you, including anonymous information and aggregated data. This information helps us better understand how our visitors use the Services, analyze demographics, interests and behaviors of our visitors, improve the Services, provide customized services and information to visitors, and similar purposes. You hold the right to opt out of receiving any of these communications as described under "Your Privacy Choices" section below.

9. Our Data Processing Activities

DATA PROCESSING	LEGAL BASIS
Providing services. We need to provide services via the Marketplace	Contract
Providing newsletters/offers/updates which may be interesting to you	Legitimate Interests
Registering you as a user	contract
Compliance with applicable laws	Legal obligation
Keeping the Service running (managing your requests, remembering your settings, hosting, and back-end infrastructure)	Legitimate Interests
Preventing frauds, illegal activity, or any violation of the terms or Privacy Policy. We may disable access to the Website, erase or correct personal data in some cases	Legitimate Interests
Improving the Marketplace (testing features, interacting with feedback platforms, traffic optimization, and data analysis and research, including profiling and the use of machine learning and other techniques over your data and in some cases using third parties to do this)	Legitimate Interests
Customer support (notifying you of any changes to the Website, services, solving issues, any bug fixing)	Legitimate Interests

10. Third Parties we use

Domefavour uses services of third parties, based on the consent you are giving us your personal data may be shared with our third-party service providers such as the independentanalytics and jetpack CRM we use to collect personal information on (“the site”). However, we only share limited personal data. For example, some of personal data may be disclosed to others when you use our Domefavour forums. For the avoidance of doubt we never share your sensitive personal data like payment details and passwords.

We carefully select our partners to help process our payment orders, and enter into agreements with them that detail points concerning the safety of user data. We do not store your bank card details as they are stored on our payment partner’s side, which has all the necessary infrastructure to ensure the safe storage of this type of information, which is confirmed by the availability of a PCI DSS certificate.

- **Advertising Partners:** We may include an ad-supported service. Subject to your settings, we provide certain Information to Users who will use them to serve you with the Services within the website.

- **Law enforcement agencies:** We may preserve or disclose information about you to comply with legal process or other government inquiry, such as a search warrant, subpoena, statute, judicial proceeding, or other legal process served on us, to assert legal rights or defend against legal claims; or to prevent, detect, or investigate illegal activity, fraud, abuse, violations of our terms, or threats to the security of Domefavour Platform.
- **Business transfer or Change of ownership:** If we are involved in a merger, acquisition, bankruptcy, re-organisation, partnership, asset sale or other transaction, we may disclose your Information as part of that transaction.

We will not share your data with any third parties for the purposes of direct marketing. We have contracts in-place with these thirdparties. This means that they cannot do anything with your personal data unless we have instructed them to do it. They will not share your personal data with any organization apart from us. They will hold it securely and retain it for the period we instruct.

11. Feedback

If You contact Us to provide feedback, register a complaint, or ask a question, We will record any Personal Information and other content that You provide in Your communication so that We can effectively respond to Your communication. We reserve the right to use this information in any manner permitted by law, to respond to Your communication. The processing of your personal data for feedback processing is based on Art. 6, para. 1, d) or f) of the GDPR.

12. Data Retention

For the sake of the GDPR and other applicable Consumer Data Protection Laws, we are entitled to keep your Personal data only for as long as we need it for legitimate business purposes and as required by applicable law. Personal data may be kept for as long as it is required or advisable for legitimate business purposes, to perform contractual obligations or, where longer, as long as is required to comply with applicable legal or regulatory obligations. Where there are technical limitations that prevent deletion or anonymization, we safeguard personal information and limit active use of it.

Upon your termination of the Terms or deletion of your account subject to your specific request your personal data shall be securely destroyed and/or returned to you within a maximum period of 30 days, unless applicable legislation or legal process prevents it from doing so.

13. Children

We comply with the Children Privacy Protection policy. Hence, our services is not directed to children under the age of 18. For this reason, we do not provide nor knowingly collect personal data from children under the age of 18. If you believe that a child under the age of 18 have used our service, please contact us and we will delete that data immediately.

14. Data Security

We have put in place numerous technical, organizational and physical safeguards measures designed to protect the personal data of users. his includes but is not limited to the following:

- a. use of Tier IV data centers in the EU, which are SOC-1, SOC-2, and SOC-3 compliant and it should be noted that this is a much higher level of protection than conventional office servers provide;
- b. all passwords are stored in hashed and salted form (and several external authorized services are supported via OAuth 2.0);
- c. all passwords in the production configuration files are encrypted and certificates required to decrypt configs are installed on the production machines by administrators and not accessible for engineers with lower levels of access;
- d. a limited number of our employees have access to personal data and they are all bound by relevant confidentiality covenants under their employment or civil law services agreements;
- e. a limited number of our employees who have access to personal your data are thoroughly checked by our security team and can only use your personal data as part of their work plus in addition to this, access is limited by authorization procedures and infrastructure, which does not allow employees with insufficient rights to access personal data.

That being said in modern fast-changing world no method of storing, using and transmitting data is completely secure.

15. Your Privacy Choices

Under the General Data Protection Regulation {GDPR}, you are entitle to the choices below;

- **Exercise of Rights:** You can exercise your rights as defined in GDPR, please send a request via e-mail contact@domefavour.ie, to exercise your rights.
- **Revocation of Consent:** You hold right to revoke your consent for processing of your data in the future at any time. However, this does not affect the lawfulness of Data processing based on the consent before the revocation.

- **Right of Access:** You have the right to obtain (i) confirmation as to whether or not your Data is being processed by us and, if so, (ii) request for more specific data on the Data.
- **Right to Rectification:** You have the right to obtain from us the rectification of inaccurate Data concerning you. In case the Data processed by us is not correct, we will rectify these without undue delay and inform you of this rectification.
- **Right to Erasure:** Should you decide that you do not want us to process your data any further, please send a request via e-mail to contact@domefavour.ie. We will erase your Data immediately and inform you of this process. Should mandatory provisions of law prevent such erasure, we will inform you without undue delay thereof.
- **Right to Restriction of Processing:** You have the right to obtain from us a restriction of processing of your Data;
- **Right to Data Portability:** You have the right to (i) receive your Data in a structured, commonly used and machine-readable format and (ii) transmit those Data to another controller without hindrance from us.
- **Right to Object:** You have the right to object at any time to the processing of Data.
- **Right to Lodge a Complaint:** You have the right to lodge a complaint with a supervisory authority, if you think that the processing of Data infringes applicable law, especially the GDPR")

Learn more about these rights, and find out how you can exercise your rights by sending us a message.

16. European Economic Area, the United Kingdom, and Switzerland

If you are a data subject in the European Economic Area, the United Kingdom, or Switzerland, you have certain rights with respect to your personal data pursuant to the General Data Protection Regulation of the European Union ("GDPR") and similar laws. This section applies to you. References to "personal information" in this Privacy Policy are equivalent to "personal data" as defined under GDPR.

Domefavour is the controller of your personal information as covered by this Privacy Policy for purposes of GDPR. Our address is as follows: contact@domefavour.ie

Please note that, we process your personal data in reliance on the legal bases below. Where the purpose of processing is:

- **To provide and improve our Services and the Site:** We process your personal data as necessary to perform the contract under which we provide our Services to you or to allow you to access our Site.

- **To comply with the law:** We process your personal data as necessary to comply with applicable laws and our legal obligations.
- **For compliance, fraud prevention, and safety:** We have a legitimate interest in processing your personal data, as described in this Privacy Policy, and our reasons for doing so outweigh any prejudice to your data protection rights. We also process your personal data as necessary to comply with our legal obligations.
- **To send marketing communications; or for research and analytics:** We have a legitimate interest in processing your personal data, as described in this Privacy Policy, and our reasons for doing so outweigh any prejudice to your data protection rights.
- **With your consent:** We process certain of your personal data with your consent. You may withdraw your consent at any time in the manner indicated when you provided consent to the collection of your personal data through your interactions with the Services or the Site.

17. United Kingdom Brexit Notice

Based on the agreement between the UK and the EU, until 2025 all the personal data transfers from the EU to the UK are not considered as transfers to a third country. For the transfer from the UK to the EU, UK finds this transfer as transfer with adequate protection, so currently there are no additional requirements needed for such personal data transfers.

18. Commitment

We take the responsibility to protect the security and privacy of our users seriously. We have established effective policies that define our commitment to data security and the information technology we manage. We are continually reviewing policies and procedures to assure that they are appropriate and effective in meeting our commitments to our community, our users, customers and ourselves. Any suspicious attempt to breach our terms and policies, or to engage in any type of unauthorized action involving our information systems, is regarded as potential criminal activity. All suspicious computer mischief will be reported to the appropriate authorities.

19. Business Transfers

In connection with, or during negotiations of, sale of company assets, any merger, financing, or acquisition of all or a portion of our business. We may share or transfer your data (including your personal data) for business transfer purposes. You will be notified via email and/or a prominent notice on the website of any change in ownership or related uses or disclosures of your data, as well as any choices you may have regarding your data in such circumstances.

20. Changes To our Privacy Policy

Changes to this privacy policy may be made by us from time to time. In no event will these changes result in the degradation of any security measures designed to protect you from unauthorized disclosure.

21. Contact Us

We hope that we can satisfy any queries you may have about the way in which we process your personal information, so we encourage you to submit your claim to our Data Protection Officer at; **contact@domefavour.ie**

However, if this does not satisfy you, you also have the right to complain to the data protection authority in the location in which you live, work or believe a data protection breach has occurred.