

PRIVACY POLICY

SCOPE

This Privacy Policy applies to personal data processed in connection with our Website Services (defined below). It does not apply to Customer Data processed within the Software, which is defined and governed by our Terms and Conditions and Data Processing Agreement.

1. DEFINITIONS

1.1 "Data Subject" means an identified or identifiable natural person to whom personal data relates.

1.2 "GDPR" means the UK General Data Protection Regulation and, where applicable, the EU General Data Protection Regulation (EU) 2016/679.

1.3 "Personal Data" means any information relating to an identified or identifiable natural person.

1.4 "Processing" means any operation performed on personal data, including collection, use, storage, and deletion.

1.5 "Website Services" means our website and account management functions. Website Services include account registration, billing and payment processing, and hosting of the website. They do not include the processing of Customer Data through the Software, which is governed by our Data Processing Agreement.

2. DATA CONTROLLER

2.1 Tarsia is the data controller for personal data processed through our Website Services.

3. PERSONAL DATA WE COLLECT

3.1 **Account Information:** When you create an account, we collect your business information as well as the full name, email, and position of a business representative.

3.2 **Payment Information:** When you purchase the Software, we collect business payment details that may including credit card information. This information is processed by our third party processor that we use for payment services, as detailed in Annex I.

3.4 We do not currently use cookies or similar tracking technologies. If this changes, we will update this Privacy Policy and provide appropriate notices or consents where required by law.

4. LEGAL BASIS FOR PROCESSING

4.1 We process your personal data on the following legal bases:

(a) **Contract Performance:** Processing necessary to provide the Website Services you have purchased and to perform our contractual obligations.

(b) **Legitimate Interests:** Processing necessary for our legitimate business interests, including account administration, fraud prevention and security, network and information security, and business management and analytics.

(c) **Legal Obligation:** Processing required to comply with legal or regulatory requirements.

5. HOW WE USE YOUR PERSONAL DATA

5.1 We use your personal data to:

(a) Provide and maintain the Website Services

(b) Process payments and manage billing

(c) Communicate with you about your account and the Website Services

(d) Provide customer support

(e) Comply with legal and regulatory obligations

6. DATA SHARING

6.1 **Payment Processing:** We share payment information with our third party payment processor as necessary for contract performance to process your payments. They processes payment data on our behalf for transaction processing, but also acts as an independent controller for certain activities such as fraud prevention, risk evaluation, and compliance monitoring under its own privacy policy.

6.2 We use trusted third-parties processors to support the Website Services (e.g. hosting and payment processing). They process personal data on our behalf under contractual terms consistent with GDPR requirements. A current list of our processors is set out in Annex I to this Privacy Policy.

6.3 **Legal Requirements:** We may disclose personal data if required by law, court order, or regulatory authority.

6.4 We do not sell, rent, or otherwise share personal data with third parties for their marketing purposes.

7. DATA RETENTION

7.1 We retain personal data for as long as necessary to provide the Website Services and to fulfil the purposes set out in this Privacy Policy.

7.2 After you close your account or stop using our Website Services, we may retain certain personal data where reasonably necessary to: (a) comply with legal and regulatory obligations (including tax and accounting); (b) resolve disputes and enforce our agreements; and (c) prevent fraud or misuse of the Website Services.

7.3 Where retention periods are mandated by law (for example financial records), we will retain data for the period required by applicable law.

8. DATA SECURITY

8.1 We implement technical and organisational measures to protect personal data, including encryption in transit, access controls and regular security reviews.

8.2 In the event of a personal data breach involving Website Services, we will notify the relevant supervisory authority without undue delay and, where feasible, within 72 hours, and where required by law, notify affected data subjects in accordance with applicable legal requirements.

8.3 Payment processing is handled through Stripe's PCI DSS compliant infrastructure with industry-standard encryption.

8.4 Access to personal data is restricted to authorised personnel who require such access to perform their duties.

9. INTERNATIONAL TRANSFERS

9.1 Your personal data may be transferred to and processed by service providers (for example Stripe) located outside the UK/EEA.

9.2 Where transfers to countries outside the UK/EEA are necessary, we rely on an appropriate transfer mechanism: for transfers to the United States these may include the EU-U.S. Data Privacy Framework (DPF) / UK extension where applicable, and otherwise Standard Contractual Clauses (SCCs) approved by the European Commission. We will update this policy if the mechanisms we rely on change.

10. YOUR RIGHTS

10.1 Under the GDPR, you have the following rights regarding your personal data:

- (a) **Right of Access:** Request information about how we process your personal data
- (b) **Right of Rectification:** Request correction of inaccurate personal data
- (c) **Right of Erasure:** Request deletion of personal data in certain circumstances
- (d) **Right to Restrict Processing:** Request limitation of processing in certain circumstances
- (e) **Right to Data Portability:** Request transfer of personal data in a structured format
- (f) **Right to Object:** Object to processing based on legitimate interests
- (g) **Right to Withdraw Consent:** Withdraw consent where processing is based on consent

10.2 To exercise these rights, contact us using the details in Section 13.

10.3 You have the right to lodge a complaint with the Information Commissioner's Office (UK) or your local EU data protection supervisory authority if you believe we have not handled your personal data properly.

11. AUTOMATED DECISION-MAKING

11.1 We do not carry out automated decision-making or profiling in connection with the Website Services that produces legal or similarly significant effects for individuals.

12. CHILDREN

12.1 Our Website Services are intended for business users. We do not knowingly collect personal data from children under the minimum age applicable in their jurisdiction; if we become aware we will delete it.

13. CHANGES TO THIS POLICY

13.1 We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements.

13.2 We will notify you of material changes by posting the updated policy on our website and, where feasible, by email to account holders.

13.3 Your continued use of our Website Services after any changes constitutes acceptance of the updated Privacy Policy.

14. CONTACT INFORMATION

14.1 For questions about this Privacy Policy or to exercise your data protection rights, contact us at:

Tarsia Compliance Ltd.

Email: support@tarsiacompliance.com

Address: 317 Manor Road, London, England, E15 3AW

14.2 We will respond to your requests within one month of receipt, or within such other timeframe as required by applicable law.

ANNEX I

Processor	Address	Description of processing	Processing locations
Stripe Payments Europe, Ltd.	1 Grand Canal Street Lower, Grand Canal Dock, Dublin, Ireland	Payment processing	EEA/US
Vercel Inc.	440 N Barranca Ave #4133, Covina, CA 91723, United States	Website hosting	US
Google Ireland Limited	Gordon House, Barrow Street, Dublin 4, Ireland	Email and productivity tools (Google Workspace)	EEA/US