

First Accounts SAAS Limited Privacy Notice 2020.

Last updated: 25 June 2020

In a nutshell: We take privacy and data security seriously. We are committed to being fair and transparent in the collection and use of your data. The Privacy Policy below describes how we protect you and how we use your data to provide you with our services.

1. Introduction

In doing business, we process personal data belonging to our customers, users, suppliers and prospective customers. We have designed our business to be compliant with the requirements of the Data Protection Acts 1988 to 2018 and we have designed our products so that they will comply with the requirements of the General Data Protection Regulation.

First Accounts SaaS Limited (FASL) makes its services available via (the “website”) for accounting services management, including but not limited to, electronic tax filings, identity management and compliance and other relevant software services for accountancy firms, businesses, tax authorities and others (our “Services”). When you sign up to use the website, you will be provided with separate terms that detail how we process information through the Platform (in short, very securely, using encryption and with your privacy at the front of our product design).

This privacy notice relates to the information collected from our website visitors and received by email, information we collect through our marketing and recruitment activities and information we receive from our suppliers. It does not relate to personal data processed through the website.

By using our website you consent to our use of cookies in accordance with the terms of the cookie policy below.

2. Collecting personal information

We may collect, store and use the following kinds of personal information:

- information about your computer and about your visits to and use of this website
- information that you provide to us when interacting with our website (including your email address) and details of any request;

First Accounts SAAS Limited Privacy Notice 2020.

Last updated: 25 June 2020

- information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including your name and email address);
- information contained in or relating to any communication that you send to us or send through our website or by email or other communications platform, excluding the website (including the communication content and metadata associated with the communication);
- information collected by FASL representatives from representatives of customers and potential customers on FASL' behalf in the course of providing or marketing our service such as basic contact information;
- information collected by FASL in its recruitment activities;
- information that suppliers provide to us in the course of their and our business activities; and
- any other personal information that you choose to send to us.

Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

FASL is responsible for the use and processing of personal data collected as described in the section above as a 'data controller'.

Where you subscribe to our Services, we may act as a 'data processor' on your behalf, with respect to data related to you or your customers. Some of this data may include personal data but we are not the data controller for this data. Please see the relevant terms of service for more information on how we process data through the Services and on the website.

3. Using personal information

Personal information submitted to us outside of the website will be used for the purposes specified in this policy or on the relevant pages of the website.

We may use your personal information to:

- administer our website and business;
- personalise our website for you;
- enable your use of the services available on our website;
- send you non-marketing commercial communications;

First Accounts SAAS Limited Privacy Notice 2020.

Last updated: 25 June 2020

- send you email notifications that you have specifically requested;
- provide you with support relating to the Services;
- send you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter);
- send you marketing communications relating to our business which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications);
- carry out our recruitment activities;
- liaise with our suppliers;
- provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);
- deal with enquiries and complaints made by or about you relating to our website or our Services;
- keep our website secure and prevent fraud; and
- verify compliance with the terms and conditions governing the use of our website.

We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.

4. Legal bases for processing personal information

We process the above personal information on the basis of our legitimate interests in liaising with and marketing to potential customers and users of our Services, on the basis of taking steps at your request in advance of entering into a contract for our Services, in order to perform a contract with you, and on the basis of your consent.

5. Disclosing personal information

We may disclose your personal information where it is collected through this website to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors where reasonably necessary for the purposes set out in this policy.

We may disclose your personal information:

First Accounts SAAS Limited Privacy Notice 2020.

Last updated: 25 June 2020

- to the extent that we are required to do so by law;
- in connection with any ongoing or prospective legal proceedings;
- in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); and
- to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling.
- except as provided in this policy, we will not provide your personal information to third parties.

6. International data transfers

We have designed our Platform and Services so that information is stored and hosted in the European Economic Area or third countries that are deemed to have an 'adequate level of protection' for personal data as that term is understood under the General Data Protection Regulation.

We also have taken great efforts to design our internal systems so that the information specified in clause 1 above is also stored within the European Economic Area or countries deemed to have an 'adequate level of protection'. Due to the nature of email and similar communications services, however, we cannot guarantee that personal data sent by such services will remain within the EEA or in countries with an 'adequate level of protection' as this will depend on many factors including your email provider.

You expressly agree to the transfers of personal information described in the section above.

7. Retaining personal information

Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Notwithstanding the other provisions of this section, we will retain documents (including electronic documents) containing personal data:

- to the extent that we are required to do so by law;
- if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and

First Accounts SAAS Limited Privacy Notice 2020.

Last updated: 25 June 2020

- in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

8. Security of personal information

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

We will store all the personal information you provide on our secure (password- and firewall-protected) servers.

You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

9. Amendments

We may update this policy from time to time by publishing a new version on our website. Changes take effect 15 days after they are posted to our website, unless you are a new user, in which case they take effect immediately.

You should check this page occasionally to ensure you are happy with any changes to this policy.

We may notify you of changes to this policy by email.

10. Your rights

You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to the supply of appropriate evidence of your identity.

You have the right to request access to and rectification or erasure of your personal data or the restriction of processing concerning your personal data or to object to processing concerning your personal data. You also have the right to data portability.

First Accounts SAAS Limited Privacy Notice 2020.

Last updated: 25 June 2020

Where the processing is based on your consent you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

We may withhold personal information that you request to the extent permitted by law.

You may instruct us at any time not to process your personal information for marketing purposes.

In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

If you are unhappy with how we process personal data, we ask you to contact us so that we can rectify the situation.

You have the right to lodge a complaint with a supervisory authority. The Irish supervisory authority is the Data Protection Commission.

11. Third party websites

Our website may include hyperlinks to, and details of, third party websites.

We have no control over, and are not responsible for, the privacy policies and practices of third parties.

12. Cookies

Please see [Cookie Policy](#) listed on our website.

13. Updating information

Please let us know if the personal information that we hold about you needs to be corrected or updated.

14. Our details

The website and Services are owned and operated by FASL.

First Accounts SAAS Limited Privacy Notice 2020.

Last updated: 25 June 2020

We are registered in Ireland under registration number 653212, and our registered office is at

17, The Cubes Offices Beacon South Quarter, Sandyford, Dublin, D18 E932.

You can contact us by post, using the postal address given above; by telephone, on the contact number published on our website from time to time; or by email, using the email address published on our website from time to time.