



# DAWN HORIZON

## Privacy Policy

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## 1. INTRODUCTION

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This Privacy Policy explains how Dawn Horizon Limited ("we," "us," or "our") collects, uses, and protects personal data when providing consulting and policy writing services to our clients. We are committed to protecting your privacy and complying with the General Data Protection Regulation (GDPR) and other applicable.

## 2. ROLES & RESPONSIBILITIES

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As a data processor, Dawn Horizon Limited processes the following types of personal data:

- **Data Controller:** Our clients are the data controllers who determine the purposes and means of processing personal data.
- **Data Processor/Controller** (Depending on the service being provided): Dawn Horizon Limited acts as a data processor or controller, depending on the data provided and the service being provided. When providing policy writing services, Dawn Horizon is likely to be a controller of the data provided to write the policy. Dawn Horizon is likely to be a processor when providing consulting services. Our contracts with our clients define the specifics of our data processing activities.

## 3. LEGAL BASIS FOR PROCESSING

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We process personal data based on the following legal bases:

- **Contractual Necessity (Article 6(1)(b) GDPR):** Processing is necessary for providing our consulting and policy writing services to our clients.
- **Legal obligation (art 6(1)(c) GDPR):** Processing data under legal obligations.
- **Legitimate Interests (Article 6(1)(f) GDPR):** Processing contact information for client communication and business administration. We have balanced our interests against your rights and freedoms and determined that our interests are not overridden.
- **Consent (Article 6(1)(a) GDPR):** In the event we conduct marketing or other processing activities that require consent, we will acquire that consent before processing.

## 4. DATA PROCESSING PURPOSES

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We process personal data to:

- Provide consulting services related to risk management, compliance, and other business areas.
- Develop and draft policies and procedures for our clients.
- Communicate with clients regarding service delivery.
- Maintain client records and manage our business operations.



- Comply with legal obligations.

## 5. DATA SHARING & TRANSFERS

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- We do not share your personal data with third-party sub-processors unless explicitly instructed by our clients and under a valid data processing agreement or if needed to provide the service.
- We currently do not transfer personal data outside of the EEA. If this changes in the future, we will update this policy and implement appropriate safeguards, including Standard Contractual Clauses and Transfer Impact Assessments where necessary.
- We will only share data when legally obligated to do so.

## 6. DATA SECURITY

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We implement appropriate technical and organisational security measures to protect personal data, including:

- Secure data storage and access controls.
- Encryption of sensitive data.
- Regular security assessments and updates.
- Data protection impact assessments where required.
- Incident response procedures.

## 7. DATA RETENTION

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- We retain personal data for the duration specified by our clients or as necessary to fulfil our contractual obligations and comply with legal requirements.
- Specific retention periods will be determined based on the type of data and the nature of the services provided.
- We will securely delete or anonymise personal data when it is no longer needed.



## 8. DATA SUBJECT RIGHTS

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Depending on if we are acting as a controller or a processor, we will assist our clients in fulfilling data subject rights requests or fulfil those requests ourselves. These rights include:

- **Right of Access:** You can request a copy of your personal data.
- **Right to Rectification:** You can request correction of inaccurate data.
- **Right to Erasure ("Right to be Forgotten"):** You can request deletion of your data.
- **Right to Restriction of Processing:** You can request limitations on processing.
- **Right to Data Portability:** You can request to receive your data in a structured, commonly used format.
- **Right to Object:** You can object to processing based on legitimate interests.
- **Right to lodge a complaint:** You have the right to lodge a complaint with your supervisory authority.

We will verify your identity before processing any request. When Dawn Horizon is acting as a processor, all data subject requests will be forwarded to the respective data controller for handling, except for data we must keep under article 30 of the GDPR.

## 9. LANDING PAGE AND DATA COLLECTION

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Our landing pages are a primary contact point for individuals interested in our consulting and policy writing services. When you visit our landing page, we automatically collect certain technical information, including your IP address, browser type, and device information, to maintain website security and analyse website traffic. This is a legitimate interest under GDPR Articles 6, 1, and f.

If you choose to contact us through the landing pages or via a contact form or via the email address listed, we will collect the information you provide, such as your name, email address, and any other details you share. This information will be used to respond to your inquiry and provide information about our services. This processing is based on legitimate interest under GDPR Articles 6, 1, and f, and when a contract is being prepared, under GDPR Articles 6, 1, and b.

## 10. COOKIES AND TRACKING TECHNOLOGIES

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Currently, we may or may not use cookies or other tracking technologies on our landing page. If cookies are used in the future, we will provide a clear and easily accessible cookie banner and a comprehensive cookie policy.



## **11. THIRD-PARTY SERVICES**

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Our website may embed content from third-party services like LinkedIn. For information on these services' data processing practices, please refer to their privacy policies.

## **12. CHANGES TO THIS NOTICE**

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We may update this Privacy Notice from time to time. We will notify our clients of any significant changes.

## **13. CONTACT US**

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If you have questions about this policy or our data practices, contact us at [contact@dawn-horizon.com](mailto:contact@dawn-horizon.com).

Our registered address is: Trim Rd, Balreask Old, Navan, Co. Meath, C15 C7Y2.  
Our Data Privacy Administrator can be contacted at: [contact@dawn-horizon.com](mailto:contact@dawn-horizon.com).

