MIROSLAV TADEJ CONSULTING

GDPR Compliance Statement

Our commitment to data protection compliance

General Data Protection Regulation (EU 2016/679) · Data Protection Act 2018 · Data Protection Commission (Ireland)

Document control

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1. Our commitment

Miroslav Tadej Consulting ("the Consultancy") is fully committed to protecting the personal data of every individual whose information it handles, and to meeting its obligations under the General Data Protection Regulation (EU 2016/679) ("GDPR") and the Data Protection Act 2018. We regard data protection not as a box-ticking exercise but as a core part of the trusted service we provide to clients in Ireland and beyond.

As a specialist cybersecurity and software-development consultancy, we apply our technical expertise directly to data protection: the systems we build are designed to protect personal data by default, and the way we run our own practice reflects the same standards we recommend to our clients. This statement summarises how we comply; the detail is set out in our Data Protection Policy and Information Security Policy.

2. Our roles: controller and processor

We are transparent about the role we play in each engagement, because it determines our responsibilities:

- **Controller:** we are a data controller for our own business data — the contact details of prospects, clients, and suppliers, and the information submitted through our enquiry and consultation forms; and
- **Processor:** we are a data processor when we build, host, or maintain systems for a client — processing the personal data of that client's customers and users strictly on the client's documented instructions.

Where we act as a processor, we enter a written data-processing agreement with the client, consistent with Article 28 of the GDPR, before any processing begins.

3. How we comply

We give effect to the GDPR through the following measures:

- **Principles & lawful basis:** we process personal data lawfully, fairly, and transparently, and only for specified, legitimate purposes, identifying and recording a lawful basis for each processing activity where we are the controller;
- **Minimisation & retention:** we collect only the personal data we need, keep it accurate, and retain it only for as long as necessary before securely deleting or anonymising it;
- **Protection by design & default:** we build privacy and security into our systems from the outset — encryption in transit and at rest, strong authentication and role-based access control, secure development following the OWASP Top 10, and least-privilege access to data;
- **Accountability:** we maintain a record of our processing activities, data-processing agreements, and a breach register, so that we can demonstrate our compliance; and
- **Ongoing review:** we keep our governance documents current and review our practice against guidance from the Data Protection Commission and the European Data Protection Board.

4. Respecting individuals' rights

We respect and facilitate the rights of data subjects under the GDPR — the rights to be informed, of access, to rectification, to erasure, to restrict processing, to data portability, to object, and rights in relation to automated decision-making. Where we are the controller, we respond to requests without undue delay and within one month. Where we are a processor, we promptly pass requests to the relevant client and assist them in responding. Identity is verified before any request is actioned.

5. Security and breach notification

We implement technical and organisational measures appropriate to the risk, in line with our Information Security Policy. Should a personal data breach occur, we act quickly: where we are the controller and the breach is likely to result in a risk to individuals, we notify the Data Protection Commission without undue delay and, where feasible, within 72 hours of becoming aware of it, and

we inform affected individuals where the breach is likely to result in a high risk to them. Where we are a processor, we notify the affected client without undue delay and support them in meeting their own obligations. Every breach is recorded and reviewed so that we learn from it.

6. Sub-processors and international transfers

We rely on a small number of reputable service providers — such as cloud hosting, source-code hosting, payment processing, and email — selected with regard to their security and compliance credentials. Where any of these acts as a sub-processor of personal data, we put equivalent contractual protections in place and disclose them to clients where we act as a processor. We primarily store and process personal data within the European Economic Area; where data is transferred outside the EEA, we ensure an appropriate safeguard such as an adequacy decision or the European Commission's Standard Contractual Clauses is in place.

7. Payment data

Where the systems we build handle payments, card data is processed entirely by a PCI-compliant payment provider (such as Stripe) and never stored on our servers or our clients' servers. This reduces the personal and financial data at risk and keeps cardholder-data obligations with the specialist provider.

8. Contact and complaints

For any data-protection question, or to exercise your rights, please contact:

Data Protection Lead	Miroslav Tadej, Principal Consultant
Organisation	Miroslav Tadej Consulting, Dublin, Ireland
Email	[Insert contact email]

You also have the right to lodge a complaint with the Data Protection Commission, Ireland's supervisory authority, at www.dataprotection.ie. We would welcome the chance to resolve any concern directly first, but this does not affect your right to contact the DPC.

9. Review and approval

This statement is reviewed at least every twelve months and whenever there is a material change in our services or in the law. It is approved and issued by the Principal Consultant of Miroslav Tadej Consulting.

Name & role	Signature	Date
Miroslav Tadej Principal Consultant	Miroslav Tadej	13/06/2026