

# GDPR Privacy Policy Development Document

## 1. Introduction

Company Overview:

DBaaS Ltd provides IT services and Database-as-a-Service solutions, including development with Yii2, Laravel, Vue.js, TailwindCSS, and cloud deployment via Docker, AWS, and Terraform.

Purpose of this Document:

To collect, organise, and structure information necessary to create a GDPR-compliant privacy policy.

## 2. Data Inventory: What Data We Collect

Data Type	Examples	Legal Basis
Identification Information	Name, Company Name, Job Title	Contract, Legitimate Interest
Contact Information	Email, Phone Number, Address	Contract, Consent
Technical Data	IP address, Browser Type, Device Info	Legitimate Interest
Usage Data	Pages visited, Interaction events	Legitimate Interest
Transaction Data	Payment details	Contract
Customer Support Records	Messages, tickets, calls	Contract, Legitimate Interest

## 3. Data Collection Methods

- Direct interaction (website forms, calls, emails)
- Automated tracking (cookies, analytics tools)
- Third-party integrations (e.g., AWS, Payment processors)
- Client onboarding (manual collection)

## 4. Purposes of Processing Personal Data

- Service provision (e.g., hosting, support, maintenance)
- Account management and billing
- Customer support

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- Marketing communications (only if consented)
- Service improvement and internal analytics
- Legal compliance and fraud prevention

## 5. Legal Bases for Processing

- Contract: Necessary to deliver services to the customer.
- Consent: Used for optional communications like newsletters.
- Legitimate Interest: Improving services, network security.
- Legal Obligation: Compliance with tax, accounting, or regulatory laws.

## 6. Data Retention Policy

- Customer account data: 6 years after end of service contract
- Support queries: 2 years
- Website analytics data: 14 months
- Marketing lists: Until unsubscribed or inactive for 24 months

## 7. Data Sharing & Third Parties

Recipient	Purpose	Safeguards Applied
AWS	Hosting infrastructure	UK/EU servers, DPA signed
Stripe	Billing	PCI DSS Compliant
CRM Systems	Customer management	GDPR compliant
Advisors	Legal compliance	Confidentiality agreements

## 8. International Data Transfers

Some data may be stored or processed outside the UK. Standard Contractual Clauses (SCCs) and equivalent mechanisms will be used to safeguard transfers.

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## 9. Data Subject Rights

DBaaS Ltd customers have the right to:

- Access their data
- Rectify inaccurate data
- Erase data ("right to be forgotten")
- Restrict processing
- Data portability
- Object to processing
- Withdraw consent at any time
- Lodge a complaint with the ICO

Contact Point: [privacy@dbaas.co.uk](mailto:privacy@dbaas.co.uk)

## 10. Security Measures

- End-to-end encryption for data in transit and at rest.
- Role-based access control internally.
- Regular vulnerability assessments and security audits.
- Incident response plan and breach notification within 72 hours.

## 11. Cookies and Tracking

- Necessary cookies (site functionality)
- Analytics cookies (Google Analytics - anonymised IPs)
- Optional marketing cookies (only activated with consent)

## 12. Policy Review and Updates

Reviewed annually or when business operations change. Customers will be notified via email and/or website banner.

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## Next Steps

Confirm legal advice if needed

Draft the public version based on this document

Prepare consent mechanisms (check signup forms, cookie banners)

Staff training on GDPR basics