PRIVACY POLICY

Effective Date: September 2026. **Last Updated:** 18 November 2026. **Company:** Aleksandra Prime Services Limited, trading as Prime Drains. **Registered in Ireland:** CRO No. 828446. **Registered Office:** Suite 16, The Cubes, Beacon South Quarter, Sandyford, Dublin 18, D18 XD36. **Director:** Sebastian Gawlik. **Website:** www.primedrains.ie. **Contact:** 083 132 3245 | info@primedrains.ie | dispatch@primedrains.ie

1. Introduction & Scope

At Prime Drains, we are committed to protecting the privacy, security, and commercial confidentiality of our clients' data. This Privacy Policy explains how Aleksandra Prime Services Limited ("we," "us," or "our") collects, processes, shares, and protects personal and corporate information when you use our website, contact our dispatch team, or engage our commercial and domestic drainage services. We operate in strict accordance with the General Data Protection Regulation (GDPR) (EU) 2016/679 and the Irish Data Protection Act 2018.

2. The Data We Collect

To provide rapid-response emergency drainage, diagnostic, and maintenance services, we collect the following categories of data:

- **Identity & Contact Data:** First name, last name, corporate titles (e.g., Facility/Property Manager), billing address, Site location (including Eircode), email address, and mobile/landline numbers.
- **Operational & Diagnostic Data:** Details regarding your drainage infrastructure, gate codes, site access instructions, and historical service logs. **Crucially, this includes WRC MSCC5/6 certified structural CCTV pipeline video footage and diagnostic reports generated on your property**.
- **Financial & Payment Data:** Corporate Purchase Order (PO) numbers, billing history, and payment details. We process all digital payments via our secure banking partner, Revolut Business. We do not store raw credit or debit card data on our internal servers.
- **Communication & Telemetry Data:** Records of emails sent to our corporate Microsoft 365 infrastructure, and call/voicemail recordings processed through our secure NUACOM VoIP telecommunications system (utilised for quality assurance, site safety, and dispatch accuracy).
- **Website & Marketing Data:** IP addresses, browser types, and tracking metrics collected via Google Analytics 4 (GA4) and Google Ads tags when you interact with our website, utilised strictly to measure the effectiveness of our emergency response digital advertising.

3. Lawful Basis for Processing

Under GDPR, we process your data under the following lawful bases:

- **Contractual Necessity:** Processing your contact, dispatch, and financial data is required to fulfil our service contract with you (e.g., attending a site, clearing a blockage, and issuing an invoice).

- **Legal Obligation:** We are required by the Irish Revenue Commissioners to retain financial, invoicing, and tax records for auditing purposes.
- **Legitimate Interests:** Recording calls via NUACOM for dispatch accuracy, capturing CCTV footage for structural integrity reports, and utilising website analytics to improve our digital emergency response times.

4. Our Secure Digital Infrastructure (Third-Party Processors)

Prime Drains utilises a highly secure, automated digital infrastructure to ensure rapid response times, accurate billing, and seamless commercial communication. We do not sell, rent, or trade your personal data to external marketing agencies. We process your data exclusively through the following industry-leading, GDPR-compliant enterprise platforms:

- **Operations & Dispatch (Tradify):** Tradify serves as our primary field service and Customer Relationship Management (CRM) system. Your site notes, Eircodes, and contact details are logged securely here to dispatch engineers, generate PDF estimates, and issue final itemised invoices.
- **Secure Payments (Revolut Business):** If you pay via an instant mobile link or on-site card terminal, Revolut securely encrypts and processes the transaction. For commercial B2B clients, we provide our Revolut Business IBAN for direct SEPA transfers.
- **Accounting & Compliance (Xero):** To ensure strict financial compliance, our Tradify invoicing and Revolut banking data sync directly with Xero, our cloud-based accounting ledger.
- **Professional Communications (Microsoft 365):** All corporate email correspondence is hosted on secure Microsoft 365 servers, ensuring your sensitive commercial data, structural reports, and site layouts are protected by enterprise-grade encryption.

5. Data Retention

We retain your personal and corporate data only for as long as necessary to fulfil the purposes for which it was collected.

- **Financial Records:** Under Irish Revenue guidelines, we securely retain financial, VAT, and invoicing records processed through Xero for a minimum of six (6) years.
- **Diagnostic Reports:** WRC CCTV survey footage and PDF structural reports are securely archived on Microsoft OneDrive to allow facility managers to request historical compliance data for their sites.

6. Your Data Protection Rights

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

- **The Right to Access:** You may request copies of your personal data or CCTV structural reports.
- **The Right to Rectification:** You may request that we correct any information you believe is inaccurate (such as updated facility management contact details).

- **The Right to Erasure:** You may request that we erase your personal data under certain conditions (excluding data we are legally mandated to retain for tax, Revenue, or liability purposes).
- **The Right to Restrict Processing:** You have the right to request that we restrict the processing of your data under certain conditions.

7. Contact Us

If you have any questions regarding this Privacy Policy, the data we hold on you, or if you would like to exercise one of your data protection rights, please contact our administrative team:

- **Email:** info@primedrains.ie | dispatch@primedrains.ie
- **Phone:** 083 132 3245