

D I G I T A X · L E G A L

Privacy Policy

How we collect, use, store, protect, and share your personal data — in compliance with the General Data Protection Regulation (GDPR), the Irish Data Protection Act 2018, the ePrivacy Directive, and the EU Artificial Intelligence Act.

VERSION 2.0 · 14 MAY 2026

DIGITAX LIMITED · COMPANY #768462

24 WOODSIDE GARDEN, ENNISKERRY ROAD, DUBLIN D18 WR4R,
IRELAND

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Your privacy is important to us. This Privacy Policy explains how **Digitax Limited** ("Digitax," "we," "us," or "our") collects, uses, stores, protects, and shares your personal data when you use the Digitax mobile application (iOS and Android) and related services (the "Service"). This Policy is designed to comply with the **General Data Protection Regulation (EU) 2016/679** ("GDPR"), the **Data Protection Act 2018** (Ireland), the **ePrivacy Directive 2002/58/EC**, and **Regulation (EU) 2024/1689** — the EU Artificial Intelligence Act.

This Privacy Policy should be read alongside our **Terms & Conditions**, which govern your use of the Service. In the event of any conflict between the Terms & Conditions and this Privacy Policy regarding data protection matters, this Privacy Policy prevails.

1 Introduction & Data Controller

1.1. The Data Controller responsible for your personal data is:

DETAIL	INFORMATION
Company Name	Digitax Limited
Company Number	768462 (registered in Ireland)
Registered Address	24 Woodside Garden, Enniskerry Road, Dublin D18 WR4R, Ireland
CEO	Corina Popov
Privacy Lead	Contactable at support@digitax.ie
Phone	+353 87 384 7822
Website	https://digitax.ie

1.2. As Data Controller, Digitax determines the purposes and means of processing your personal data and is responsible for ensuring that processing is carried out in compliance with applicable data protection laws.

1.3. **Data Protection Officer:** Digitax has assessed whether the appointment of a Data Protection Officer (DPO) is required under GDPR Article 37. Given the current scale and nature of processing, a formal DPO appointment has not been made. This assessment is reviewed annually. In the interim, the Privacy Lead fulfils a comparable oversight function and can be contacted at support@digitax.ie.

1.4. References to "personal data" in this Policy have the meaning given in Article 4(1) of the GDPR: any information relating to an identified or identifiable natural person.

2 Personal Data We Collect

We collect and process the following categories of personal data:

2.1. Data You Provide Directly

CATEGORY	DATA TYPES	WHEN COLLECTED
Registration Data	Full name, email address, phone number, business name, business type	Account creation
Tax Identification	PPS number (Personal Public Service Number), tax registration number (where provided for the Professional Filing Service)	When engaging tax filing services
Financial Data	Income records, expense records, receipt images, invoice details, VAT records, bank transaction descriptions, payment amounts	Ongoing use of the App
Documents	Receipt images, invoice PDFs, supporting tax documents uploaded to the App	When you upload documents
Communications	Support inquiries, email correspondence, in-app feedback	When you contact us
Payment Data	Subscription payment references, dates, and amounts. Full card details are processed exclusively by Stripe and are never stored by Digitax (SAQ-A scope).	When you subscribe

2.2. Data Collected Automatically

CATEGORY	DATA TYPES	PURPOSE
Device Data	Device type, operating system, OS version, device identifier, screen resolution	Service compatibility & debugging
Usage Data	Features used, session duration, interaction patterns, app version, crash logs	Service improvement & stability
Network Data	IP address (anonymised for analytics), general location (country/region level only)	Security & fraud prevention

2.3. Data Generated by the Service

CATEGORY	DATA TYPES	HOW GENERATED
Tax Calculations	Income tax estimates, VAT calculations, profit & loss summaries, preliminary tax positions	Computed by deterministic arithmetic from your input data — not AI
AI Categorisations	Automated expense categories, suggested classifications	Generated by machine-learning models (OpenAI / Anthropic) based on your transaction data
Reports	Tax returns (Form 11, VAT3), financial summaries, export files	Generated on your request

3 How We Collect Your Data

We collect personal data through the following methods:

- **Direct Input:** Information you enter when creating your account, adding income/expenses, uploading receipts, or contacting support
- **Automated Collection:** Device and usage data collected automatically when you use the App through standard mobile analytics
- **AI Processing:** Categorisations generated by machine-learning models (OpenAI / Anthropic) based on data you provide (see Section 7)
- **Third-Party Sources:** Payment confirmation data from Stripe (transaction status only — we never receive your full card details)

We do not collect data from social media profiles, public databases, or data brokers. We do not purchase personal data from any third party.

4 Legal Bases for Processing

Under GDPR Article 6, we process your personal data on the following legal bases:

LEGAL BASIS	GDPR ARTICLE	APPLIES TO
Performance of Contract	Art. 6(1)(b)	Processing necessary to provide the Service: account management, expense tracking, tax calculations, invoice generation, report creation, Professional Filing Service
Legitimate Interest	Art. 6(1)(f)	Service improvement through anonymised usage analytics; fraud prevention and security monitoring; customer support; newsletter delivery to paying subscribers via soft opt-in (see Section 6)
Legal Obligation	Art. 6(1)(c)	Retention of tax filing records (Section 886 TCA 1997); AML/CFT obligations (CJ(MLTF) Act 2010); compliance with court orders or regulatory requirements; payment transaction record retention (Irish accounting regulations)
Consent	Art. 6(1)(a)	Newsletter for free-trial users who have not entered payment details; optional third-party marketing (if any); any future processing not covered by the above bases

Where we rely on legitimate interest, we have conducted a balancing test to ensure that our interests do not override your fundamental rights and freedoms. You may request details of these assessments by contacting support@digitax.ie.

5 Purposes of Processing

5.1. Core Service Delivery (SaaS Tool)

- Creating and managing your user account
- Providing expense tracking, income recording, and receipt storage features
- Generating deterministic tax calculations, VAT computations, and financial summaries
- Processing AI-powered automated expense categorisation and receipt OCR
- Creating and managing invoices
- Generating data exports at your request

5.2. Professional Filing Service

- Preparing Form 11 (Income Tax Return) and VAT3 returns for review by a TAIN-registered tax professional
- Submitting tax returns to Revenue Commissioners via the ROS portal on your behalf
- Retaining records related to filed returns as required by Irish tax law and agent obligations

5.3. Communications

- Sending transactional emails (account confirmations, password resets, payment receipts)
- Delivering the Digitax newsletter (see Section 6)
- Responding to your support inquiries
- Notifying you of material changes to the Service or these policies

5.4. Service Improvement & Security

- Analysing anonymised usage patterns to improve app features and user experience
- Monitoring for security threats, fraud, and unauthorised access
- Debugging crashes and performance issues
- Conducting internal audits and quality assurance

5.5. Legal & Regulatory Compliance

- Fulfilling AML/CFT obligations (customer due diligence, record-keeping) — see Section 20
- Responding to lawful requests from regulatory authorities
- Maintaining records as required under tax law (Section 886 TCA 1997, Section 851A TCA 1997)

6 Newsletter & Marketing Communications

6.1. Signup Process

During account registration, the signup screen presents a **clearly visible and prominently positioned opt-out toggle** for the Digitax product newsletter. The toggle is pre-selected (opted in), but you can deselect it before completing registration. If you do not opt out at the point of registration, your email address is added to the newsletter mailing list.

6.2. Legal Basis — Paying Subscribers (Soft Opt-In)

For users who subscribe to a paid plan (including those in active negotiations for a subscription — i.e., users who have entered payment details during the Trial Period), newsletter enrolment relies on the **"soft opt-in"** provision under **Regulation 13(2) of S.I. No. 336/2011**, which permits electronic marketing to existing customers for similar products or services, provided that:

- The email address was obtained in the context of a sale or negotiations for a sale
- The marketing relates to similar products or services (the Digitax App)
- The user was given a clear and simple opportunity to refuse at the time the details were initially collected (the opt-out toggle at signup)
- Each subsequent communication includes a clear unsubscribe mechanism

6.3. Legal Basis — Free-Trial Users (Consent)

For users who remain on the free trial and have not entered payment details, the soft opt-in basis under S.I. 336/2011 may not apply (as they may not yet be in "negotiations for a sale"). For these users, newsletter enrolment is based on **consent under GDPR Article 6(1)(a)**, evidenced by the user not deselecting the opt-out toggle at signup. We acknowledge this is a more conservative position and apply it to reduce regulatory risk. The DPC has taken enforcement action against organisations relying on the soft opt-in for non-customers.

6.4. Newsletter Content

The Digitax newsletter includes:

- Product updates and new feature announcements
- Tax deadline reminders and tips relevant to self-employed users in Ireland
- Service maintenance notifications
- Educational content about tax and accounting best practices

The newsletter does not include third-party advertising.

6.5. How to Unsubscribe

You may unsubscribe at any time by:

- Clicking the "**Unsubscribe**" link at the bottom of any newsletter email
- Emailing support@digitax.ie with the subject "Unsubscribe"

Unsubscribing does not affect your account status, app access, or any other aspect of the Service. We process unsubscribe requests within **48 hours**.

6.6. Newsletter Delivery & Tracking

Newsletters are delivered via **Beehiiv**, a third-party email delivery platform. Only your email address is shared with Beehiiv. Beehiiv processes your data under a Data Processing Agreement (DPA) with Digitax.

Email Engagement Tracking: Beehiiv uses standard email tracking technologies — specifically open-tracking pixels and link-click tracking — to measure newsletter engagement (open rates, click-through rates). Under the ePrivacy Directive, this tracking involves accessing information stored on your device (the tracking pixel). This tracking is integral to the newsletter delivery service. If you do not wish to be tracked, you may unsubscribe from the newsletter entirely or configure your email client to block remote images.

7 AI-Powered Features & Data Processing

The Digitax App uses **machine-learning models** to power certain features. This section explains how AI processes your data.

7.1. AI Features in the App

AI FEATURE	WHAT IT DOES	DATA PROCESSED	AI PROVIDER
Expense Categorisation	Suggests categories for expenses based on transaction descriptions	Transaction descriptions, amounts, merchant names (no PPS numbers)	OpenAI / Anthropic
Receipt OCR	Extracts text, amounts, dates, and merchant details from receipt images	Receipt images you upload	OpenAI / Anthropic

7.2. What Is Not AI

Tax calculations (income tax, USC, PRSI, VAT) are **deterministic arithmetic** based on published Revenue rates and thresholds. They are not powered by machine-learning models, are not classified as AI features, and are not subject to AI-specific disclosures in this Policy. We make this distinction to ensure the credibility and accuracy of our AI-related disclosures.

7.3. EU AI Act Classification

The AI features listed in Section 7.1 are **not classified as high-risk** under Annex III of the EU Artificial Intelligence Act (Regulation (EU) 2024/1689). They do not fall within the mandatory scope of Article 50 (which covers AI systems interacting directly with natural persons as interlocutors, generating synthetic content, performing emotion recognition, or biometric categorisation). Nevertheless, we **voluntarily apply Article 50-style transparency measures** as a matter of best practice:

- AI-powered outputs are **clearly labelled** in the App (e.g., "AI Suggested" tags)
- AI outputs are **suggestions only** — they do not make autonomous decisions on your behalf
- You can **review, edit, or override** any AI-generated output at any time
- When using "auto-categorise" for the first time, the App requires you to **review and approve the batch** before it is applied
- You may **disable AI features** and perform manual categorisation in Settings

7.4. How AI Processes Your Data

- Transaction descriptions and receipt images are sent to OpenAI and/or Anthropic via API solely for the purpose of generating the categorisation or OCR result

- Your individual financial data is **not used to train** the general-purpose AI models of OpenAI or Anthropic
- AI processing is performed under **Data Processing Agreements (DPAs)** with each provider
- Data is processed in compliance with GDPR principles of data minimisation and purpose limitation
- PPS numbers, full names, and full personal profiles are **never sent** to AI providers

7.5. AI Accuracy Disclaimer

AI outputs are not guaranteed to be accurate. Automated categorisations are statistical predictions generated by machine-learning models and may be incorrect. You must review all AI-generated outputs before using them for tax or accounting purposes. Digitax accepts no liability for losses arising from unreviewed AI categorisations.

7.6. Your Rights Regarding AI

- Request an explanation of how a specific AI categorisation was determined — we will explain the categorisation logic **to the extent technically feasible**, noting that ML model outputs may not always be fully explainable at a granular level. Email support@digitax.ie
- Object to AI processing under GDPR Article 21 — email support@digitax.ie
- Report AI errors or concerns — email support@digitax.ie

GDPR Article 22: Digitax does not make decisions based solely on automated processing that produce legal or similarly significant effects on you. AI categorisations are suggestions that you must review. If you use "auto-categorise" without reviewing, this is your choice and does not constitute automated decision-making by Digitax.

8 Data Sharing & Named Subprocessors

We share your personal data only with the following named recipients, for the specific purposes described, and only to the extent necessary:

PROCESSOR	PURPOSE	DATA SHARED	SAFEGUARDS
Amazon Web Services (AWS)	Cloud infrastructure, data storage, and hosting (EU — eu-west-1 Ireland region)	All App data (encrypted at rest with AES-256, in transit with TLS 1.2+)	DPA in place; AWS is ISO 27001, ISO 27017, ISO 27018, SOC 1/2/3 certified
OpenAI	AI-powered expense categorisation and OCR	Transaction descriptions, amounts, merchant names, receipt images. No PPS numbers.	DPA in place; data not used for model training; API processing only
Anthropic	AI-powered features and processing	Transaction descriptions, amounts, merchant names, receipt images. No PPS numbers.	DPA in place; data not used for model training; API processing only
Stripe, Inc.	Subscription payment processing	Payment card details (processed exclusively by Stripe). Digitax operates within SAQ-A scope and never stores, processes, or transmits cardholder data.	PCI-DSS Level 1 certified (Stripe's certification); DPA in place
Beehiiv	Newsletter email delivery and engagement tracking	Email address; open/click tracking data	DPA in place; see Section 6.6 for tracking disclosure
SafeDevs	App development and technical maintenance	Backend systems access for development and maintenance purposes	DPA in place; access subject to role-based controls
Revenue Commissioners (via ROS)	Tax return submission (Professional Filing Service only)	Tax return data (Form 11, VAT3)	Statutory obligation; submitted via secure Revenue Online Service (ROS) portal

We do not:

- Sell, rent, or trade your personal data to any third party
- Share your data with advertisers or data brokers
- Use your financial data for any purpose other than providing the Service
- Allow third-party processors to use your data for their own purposes

All third-party processors are bound by Data Processing Agreements (DPAs) in accordance with GDPR Article 28, which require them to process your data only on our instructions and to implement appropriate security measures. A current list of subprocessors is maintained and available on request from support@digitax.ie.

9 International Data Transfers

9.1. Your personal data is primarily stored and processed within the **European Economic Area (EEA)**, specifically in AWS's `eu-west-1` (Ireland) region.

9.2. Where data is transferred outside the EEA (e.g., to OpenAI or Anthropic, which process API requests through infrastructure that may include U.S.-based servers), we ensure appropriate safeguards are in place in accordance with GDPR Chapter V, including:

- **Standard Contractual Clauses (SCCs)** approved by the European Commission (Commission Implementing Decision (EU) 2021/914)
- **Adequacy decisions** where applicable (e.g., the EU-U.S. Data Privacy Framework)
- **Supplementary measures** where necessary, including encryption in transit and at rest, access controls, and data minimisation (no PPS numbers or full personal profiles are sent to AI providers)

9.3. You may request information about the specific safeguards in place for any international transfer by contacting support@digitax.ie.

10 Data Retention

We retain your personal data only for as long as necessary for the purposes described in this Policy, or as required by law:

DATA CATEGORY	RETENTION PERIOD	LEGAL BASIS / REASON
Active Account Data	Duration of your active account	Performance of contract (Art. 6(1) (b))
Post-Deletion Data	60 calendar days after confirmed deletion (Day 15 of the deletion timeline — see Section 11)	Legitimate interest (data recovery grace period)
Tax Filing Records (Professional Filing Service)	Minimum 6 years from end of relevant tax year	Legal obligation: Section 886 TCA 1997; agent obligations under Section 851A TCA 1997
Payment Transaction Records	7 years from date of transaction	Legal obligation: Irish accounting regulations
AML/CFT Records	Minimum 5 years after end of business relationship	Legal obligation: CJ(MLTF) Act 2010 (see Section 20)
Support Correspondence	2 years from last contact, or account deletion + 60 days (whichever is shorter)	Legitimate interest (service quality, dispute resolution)
Anonymised Analytics	Indefinitely (no personal data)	N/A — fully anonymised, non-reversible aggregation

After the applicable retention period, personal data is permanently and irreversibly deleted from our active systems and backups.

11 Account Deletion & Data Erasure

Download Your Data Before Deleting Your Account!

You must export your data before requesting account deletion using the in-app export feature (Section 13). After the retention window closes, your data is **permanently lost** and cannot be recovered by Digitax under any circumstances.

11.1. How to Delete Your Account

- **In-App:** Settings → Account → Delete Account
- **Email:** Send a request to support@digitax.ie with the subject "Account Deletion Request"

11.2. Deletion Timeline

The deletion process follows a single, sequential timeline from the date you submit your request:

STAGE	DURATION	WHAT HAPPENS
Day 0	—	You submit deletion request. Confirmation email sent.
Days 1—14	14 days	Cooling-off period. You may cancel by logging in or emailing support. Account remains fully functional.
Day 15	—	Confirmed deletion. Account deactivated. You lose access to the App. 60-day retention window begins.
Days 15—74	60 days	Retention window. Data remains in our systems. You may request a copy by emailing support (30-day response per GDPR Art. 12(3)).
Day 75	—	Permanent erasure. All personal data permanently deleted from all systems and backups.

To be explicit: The 60-day retention window starts on Day 15 (after the cooling-off period), not on Day 0. The total elapsed time from request to permanent erasure is 74 days.

11.3. Exceptions to Erasure

Certain data may be retained beyond Day 75 where legally required:

- **Tax Filing Records:** Where Digitax submitted a return on your behalf — minimum 6 years (Section 886 TCA 1997; Section 851A TCA 1997). Only data strictly necessary for legal compliance is retained.
- **Payment Transaction Records:** 7 years from date of transaction (Irish accounting regulations).
- **AML/CFT Records:** Minimum 5 years after end of business relationship (see Section 20).
- **Active Legal Proceedings:** Data relevant to ongoing legal proceedings or regulatory investigations.

12 Dormant Accounts

12.1. If your account has been inactive (no login, no data entry, no active subscription) for **24 consecutive months**, we will send you a notification email informing you that your account is scheduled for deletion.

12.2. You will have **30 days** from the notification date to log in and reactivate your account.

12.3. If you do not respond within 30 days, your account enters the standard deletion timeline at **Day 15** (confirmed deletion — no additional cooling-off period, as the 30-day notification period served this purpose). Your data will then be retained for 60 days before permanent erasure.

12.4. This policy applies equally to free-trial users who never subscribed and to lapsed subscribers who did not actively delete their account.

13 Data Export & Portability

In accordance with your right to data portability under GDPR Article 20:

13.1. In-App Data Export

EXPORT OPTION	CONTENTS	FORMAT
All Data	All income, expenses, receipts, invoices, and tax calculations	ZIP (Excel spreadsheets + document images)
Income Only	Income records and associated invoices	ZIP (Excel + documents)
Expenses Only	Expense records and associated receipts	ZIP (Excel + receipt images)

13.2. You may select a custom date range. We strongly recommend downloading your data regularly and always before requesting account deletion.

13.3. If you cannot use the in-app feature, email support@digitax.ie.

14 Your Rights Under GDPR

Under the GDPR, you have the following rights. To exercise any right, contact support@digitax.ie.

RIGHT	GDPR ART.	DESCRIPTION	HOW TO EXERCISE
Access	Art. 15	Obtain confirmation of processing and a copy of your personal data, including processing purposes, categories, recipients, and retention periods.	Email support@digitax.ie
Rectification	Art. 16	Correct inaccurate data or complete incomplete data.	In-app or email
Erasure	Art. 17	Request deletion (subject to Sections 10–11 retention requirements).	In-app or email
Restriction	Art. 18	Restrict processing in certain circumstances.	Email support@digitax.ie
Portability	Art. 20	Receive data in structured, machine-readable format.	In-app export or email
Objection	Art. 21	Object to processing based on legitimate interest or for direct marketing. We will cease unless we demonstrate compelling legitimate grounds.	Email support@digitax.ie
Automated Decisions	Art. 22	Not to be subject to decisions based solely on automated processing with legal/significant effects. Note: Digitax AI features are suggestions only — not automated decisions.	N/A
Withdraw Consent	Art. 7(3)	Withdraw consent at any time. Withdrawal does not affect prior lawful processing.	Unsubscribe link or email

Response Times: We acknowledge requests within **72 hours** and respond substantively within **30 days** (GDPR Art. 12(3)). Complex requests may be extended by 60 days with notice.

Identity Verification: We may verify your identity before processing a rights request to prevent unauthorised access.

No Fee: Exercising your rights is free. We may charge a reasonable fee for manifestly unfounded or excessive requests (GDPR Art. 12(5)).

15 Data Security

We implement appropriate technical and organisational measures in compliance with GDPR Article 32:

15.1. Technical Measures

- **Encryption in Transit:** TLS 1.2 or higher for all data transmitted between the App and our servers
- **Encryption at Rest:** AES-256 encryption on AWS infrastructure
- **Access Controls:** Role-based access controls (RBAC) limiting access to those who require it
- **Authentication:** Secure token-based authentication and session management
- **Infrastructure:** AWS `eu-west-1` region; firewalls, intrusion detection, regular vulnerability scanning
- **Payment Security:** Digitax operates within PCI-DSS SAQ-A scope — no cardholder data is stored, processed, or transmitted by Digitax systems. All payment data is handled exclusively by Stripe (PCI-DSS Level 1 certified).

15.2. Organisational Measures

- **Staff Training:** All personnel with data access receive data protection training
- **Confidentiality:** Employees and contractors bound by confidentiality obligations
- **Access Reviews:** Regular reviews of system access privileges
- **Vendor Assessments:** Third-party processors assessed for security before engagement
- **Incident Response:** Documented procedures for data security incidents

No system is completely secure. We cannot guarantee absolute security but will notify you promptly in the event of a breach (Section 17).

16 Data Protection Impact Assessment

16.1. Given that Digitax processes financial data, PPS numbers (for the Professional Filing Service), and uses automated categorisation via machine-learning models, we have conducted a **Data Protection Impact Assessment (DPIA)** in accordance with GDPR Article 35.

16.2. The DPIA assesses the risks to your rights and freedoms arising from our processing activities and documents the measures we have implemented to mitigate those risks, including data minimisation, encryption, access controls, DPAs with subprocessors, and the voluntary application of AI transparency measures.

16.3. The DPIA is reviewed annually or whenever there is a significant change to our processing activities. The DPIA is an internal document but its conclusions are available on request from the Privacy Lead at support@digitax.ie.

17 Data Breach Notification

17.1. Notification to Supervisory Authority

Where a breach is likely to result in a risk to your rights and freedoms, we notify the **Data Protection Commission (DPC)** within **72 hours** (GDPR Art. 33).

17.2. Notification to You

Where a breach is likely to result in a **high risk**, we notify you without undue delay via email and/or in-app notification (GDPR Art. 34).

17.3. Breach Documentation

All breaches are documented regardless of severity, including effects and remedial actions (GDPR Art. 33(5)).

18 Children & Age Requirements

18.1. **Contractual Age (18+)**: You must be at least 18 years of age to create an account and enter into the contractual agreement governed by our Terms & Conditions.

18.2. **Digital Age of Consent (16+)**: Under Section 31 of the Data Protection Act 2018, the digital age of consent in Ireland for information society services is **16 years of age**. We do not knowingly collect personal data from anyone under 16.

18.3. If we become aware that we have collected personal data from a person under 16, we will delete that data as quickly as possible.

18.4. If you believe a person under 16 has provided us with personal data, please contact support@digitax.ie immediately.

19 Cookies & Tracking Technologies

19.1. Mobile App

- **Authentication tokens**: Secure login session maintenance
- **Session data**: App state during use
- **Anonymised analytics**: Usage patterns for service improvement (no personal identifiers)

We do not use advertising cookies, third-party tracking pixels, or cross-app tracking within the mobile App.

19.2. Newsletter Tracking

The Beehiiv newsletter platform uses open-tracking pixels and link-click tracking. See Section 6.6 for full disclosure.

19.3. Website (digitax.ie)

Separate cookie notices apply on the website, displayed via a consent banner in compliance with the ePrivacy Directive.

20 AML/CFT Data Processing

20.1. As a TAIN-registered tax agent (TAIN 81620N), Digitax is a **designated person** under Section 25 of the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 (as amended).

20.2. What This Means for Your Data:

- Where you engage the Professional Filing Service, we may collect additional identity verification documents as part of **Customer Due Diligence (CDD)**
- PPS numbers collected for the Professional Filing Service may be retained partly for AML/CFT compliance purposes, not only under tax law
- CDD records are retained for a minimum of **5 years** after the end of the business relationship, independently of other retention periods

20.3. **Legal Basis:** AML/CFT processing is based on legal obligation under GDPR Article 6(1)(c).

20.4. **Tipping-Off Prohibition:** Digitax is legally prohibited from disclosing whether a suspicious transaction report has been made (Section 49, CJ(MLTF) Act 2010). We cannot inform you if your data has been disclosed to competent authorities under AML/CFT reporting obligations.

21 UK Users — Future Provision

21.1. This Privacy Policy is currently drafted to comply with **EU/EEA data protection law** (GDPR, DPA 2018 Ireland, ePrivacy Directive).

21.2. If Digitax expands to serve users resident in the **United Kingdom** (including in connection with the UK Making Tax Digital for Income Tax Self-Assessment (MTD ITSA) programme), a supplementary section addressing the **UK GDPR** (as retained under the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019) and the role of the **Information Commissioner's Office (ICO)** as the relevant supervisory authority will be added to this Policy.

21.3. Until such expansion occurs, UK-specific provisions do not apply. We will notify users of any changes via the procedures in Section 22.

22 Changes to This Privacy Policy

22.1. We may update this Privacy Policy from time to time. When we make changes:

- The "Effective Date" and version number will be updated
- Material changes will be communicated via in-app notification and/or email at least **30 days** before taking effect
- Non-material corrections may be applied without advance notice

22.2. Your continued use of the Service after changes take effect constitutes acknowledgement of the updated Policy.

23 Supervisory Authority & Complaints

23.1. If you are not satisfied with how we handle your data, you have the right to lodge a complaint with the Irish Data Protection Commission:

DETAIL	INFORMATION
Organisation	Data Protection Commission (An Coimisiún um Chosaint Sonraí)
Address	21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland
Website	www.dataprotection.ie
Email	info@dataprotection.ie
Phone	+353 (0)1 765 0100 / 1800 437 737 (lo-call)

23.2. If you reside in another EU/EEA Member State, you may lodge a complaint with your local supervisory authority.

23.3. Before filing a formal complaint, we encourage you to contact us at support@digitax.ie so we can attempt to resolve your concern directly.

24 Contact Us

CHANNEL	DETAILS
Email	support@digitax.ie
Privacy Lead	support@digitax.ie (subject: "Privacy")
Phone	+353 87 384 7822
Post	Digitax Limited, 24 Woodside Garden, Enniskerry Road, Dublin D18 WR4R, Ireland
Website	https://digitax.ie

For data protection requests, include "Data Protection Request" in the subject line.

This Privacy Policy was last updated on 14 May 2026. Version 2.0.