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# Privacy Policy for Combat Tailor

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**Last Updated: July 20, 2025**

At **Combat Tailor**, operated by **Newbiz Limited**, we are committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website, <https://www.google.com/search?q=combat-tailor.com> (the "Website"), and use our tailoring services.

Please read this Privacy Policy carefully. If you do not agree with the terms of this Privacy Policy, please do not access the Website or use our services.

## 1. Important Information and Who We Are

**Purpose of this Privacy Policy:** This Privacy Policy aims to give you information on how Combat Tailor (Newbiz Limited) collects and processes your personal data through your use of this Website and our services, including any data you may provide when you purchase a service or sign up for our newsletter.

**Controller:** Newbiz Limited is the data controller and is responsible for your personal data (collectively referred to as "Combat Tailor," "we," "us," or "our" in this Privacy Policy).

Contact Details:

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us using the details below:

- **Email:** [Insert your Contact Email Address]
- **Postal Address:** [Insert your Business Address]

## 2. The Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store, and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data:** Includes first name, last name, title.
- **Contact Data:** Includes billing address, delivery address, email address, and telephone numbers.
- **Financial Data:** Includes payment card details (processed securely by our payment processor – we do not store these directly).

- **Transaction Data:** Includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data:** Includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Website.
- **Usage Data:** Includes information about how you use our Website and services.
- **Marketing and Communications Data:** Includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.<sup>1</sup>

### 3. How is Your Personal Data Collected?<sup>2</sup>

We use different <sup>3</sup> methods to collect data from and about you, including through:

- **Direct interactions:** You may give us your Identity, Contact, and Financial Data by filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you:
  - Apply for our services;
  - Create an account on our Website;
  - Subscribe to our service or publications;
  - Request marketing to be sent to you;
  - Give us feedback or contact us.
- **Automated technologies or interactions:** As you interact with our Website, we will automatically collect Technical Data about your equipment, Browse actions, and patterns. We collect this personal data by using cookies, server logs, and other similar technologies. Please see our Cookie Policy (if applicable, otherwise incorporate cookie information directly into this policy) for more details.
- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from analytics providers such as Google Analytics.
  - Contact, Financial, and Transaction Data from providers of technical, payment, and delivery services.

## 4. How We Use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to **perform the contract** we are about to enter into or have entered into with you (e.g., processing your order for tailoring services).
- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests (e.g., to improve our services).
- Where we need to comply with a **legal obligation** (e.g., for tax purposes).

### Purposes for which we will use your personal data:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order, including: (a) Manage payments, fees, and charges (b) Collect and recover money owed to us <sup>4</sup>	(a) Identity (b) Contact (c) Financial (d) Transaction <sup>5</sup>	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) <sup>67</sup>
To manage our relationship with you <sup>8</sup> which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey <sup>9</sup>	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications <sup>10</sup>	<sup>11</sup> (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

To enable you to complete a survey	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, and grow our business)
To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business, and to inform our marketing strategy) <sup>12</sup>
To use data analytics to improve our Website, products/services, marketing, customer relationships, and experiences <sup>13</sup>	(a) Technical (b) Usage <sup>14</sup>	Necessary for our le <sup>15</sup> gitimate interests (to define types of customers for our products and services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (to develop our

about services that may be of interest to you <sup>16</sup>	(d) Usage (e) Profile <sup>17</sup>	products/services and grow our business) <sup>18</sup>
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**Marketing:** We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.<sup>19</sup>

**Promotional offers from us:** We may use your Identity, Contact, Technical, Usage, and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services, and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.<sup>20</sup>

**Third-party marketing:** We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.<sup>21</sup>

## 5. Disclosures of Your Personal Data

We may share your personal data with the parties set out below for the purposes set out in the table above:

- **Internal Third Parties:** Other companies within the Newbiz Limited group acting as joint controllers or processors and who are based in [e.g., Ireland] and provide IT and system administration services and undertake leadership reporting.
- **External Third Parties:**
  - Service providers acting as processors based in [e.g., Ireland, EU, etc.] who provide IT and system administration services, payment processing, and delivery services.
  - Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, and insurers based in Ireland who provide consultancy, banking, legal, insurance, and accounting services.
  - Revenue Commissioners, regulators, and other authorities acting as processors or joint controllers based in Ireland who require reporting of processing activities in certain circumstances.
- **Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.** Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. International Transfers

We do not currently transfer your personal data outside of the European Economic Area (EEA).

Should we ever need to transfer your personal data outside the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the EU and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 7. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.<sup>22</sup>

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.<sup>23</sup>

## 8. Data Retention<sup>24</sup>

**H<sup>25</sup>ow long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use

or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

By law, we have to keep basic information about our customers (including Contact, Identity, Financial, and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances, you can ask us to delete your data: see "Your Legal Rights" below for more information.

In some circumstances, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.<sup>26</sup>

## 9. Your Legal Rights<sup>27</sup>

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- **Request access** to your personal data (commonly known as a "data subject access request").
- **Request correction** of the personal data that we hold about you.
- **Request erasure** of your personal data.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.<sup>28</sup>
- **Request restriction of processing** of your personal data.<sup>29</sup>
- **Request the transfer** of your personal data to<sup>30</sup> you or to a third party.
- **Withdraw consent** at any time where we are relying on consent to process your personal data.

If you wish to exercise any of the rights set out above, please contact us at [Insert your Contact Email Address].

**No fee usually required:** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

**What we may need from you:** We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.



**Time limit to respond:** We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.<sup>31</sup>

## 10. Glossary<sup>32</sup>

- **Controller:** The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.<sup>33</sup>
- **Processor:** A natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.
- **Legitimate Interest:** The interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Performance of Contract:** Processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Comply with a legal obligation:** Processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

## 11. Changes to this Privacy Policy

We keep our Privacy Policy under regular review. This version was last updated on **July 20, 2025**. Any changes will be posted on this page.

## 12. Your Right to Complain

You have the right to make a complaint at any time to the **Data Protection Commission (DPC)**, the Irish supervisory authority for data protection issues ([www.dataprotection.ie](http://www.dataprotection.ie)). We would, however, appreciate the chance to deal with your concerns before you approach the DPC, so please contact us in the first instance.

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