



# Privacy policy

Last updated 7 October 2026

This policy explains what personal data Noraina Ltd collects through [www.noraina.cloud](http://www.noraina.cloud), our client area and our dealings with customers and prospective customers, why we use it, who we share it with and the rights you have under the General Data Protection Regulation (GDPR) and the Irish Data Protection Act 2018.

## 1. Who we are

The controller of your personal data is Noraina Ltd, a private company limited by shares incorporated in Ireland under registration number 614532, with its registered office at Unit 3D North Point House, North Point Business Park, New Mallow Road, Cork T23 AT2P, Ireland.

For any question about this policy or your personal data, email [info@norainacloud.com](mailto:info@norainacloud.com).

## 2. Scope

This policy covers personal data we decide how to use: visitors to our website, people who contact us or request an assessment, contacts at our customers, suppliers and partners, and users of our client area at [dash.noraina.cloud](https://dash.noraina.cloud).

It does not cover data our customers store or process on our platform and services. For that data the customer is the controller and we act as its processor, under the terms of our services agreement and any data processing agreement signed with the customer.

## 3. What we collect and why

| Data                                                                                                                                                                                       | Purpose                                                               | Legal basis (GDPR article 6)                                                                                                                |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| Contact and assessment forms: name, work email, company, your message and, for assessments, the framework, certification stage and target date you choose; the page you sent the form from | Replying to your request, preparing a proposal and following up on it | Steps taken at your request before entering into a contract (6(1)(b)) and our legitimate interest in answering business enquiries (6(1)(f)) |

| Data                                                                                                                                                         | Purpose                                                                                                                                                       | Legal basis (GDPR article 6)                                                                                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| Customer account and billing: names, business email and phone of customer contacts, company name, billing address, VAT number, order and invoice history     | Providing the services you contract, support, invoicing and keeping accounting records                                                                        | Performance of a contract (6(1)(b)) and legal obligations such as tax law (6(1)(c))                                                            |
| Payment details                                                                                                                                              | Taking payment for our services. Card and direct debit details are entered directly with Stripe and GoCardless; Noraina never sees or stores your card number | Performance of a contract (6(1)(b))                                                                                                            |
| Technical data: IP address, browser and device information, pages requested, date and time; signals collected by Cloudflare Turnstile when you submit a form | Delivering the website, protecting it and its forms against abuse and attacks, and investigating incidents                                                    | Our legitimate interest in running a secure website (6(1)(f))                                                                                  |
| Name, business email and company                                                                                                                             | Sending occasional emails about our products, services and events                                                                                             | Your consent, or for existing customers our legitimate interest under the soft opt-in of S.I. No. 336 of 2011. You can unsubscribe at any time |

We only collect personal data you give us or that is generated when you use our website and services. We do not buy personal data and we do not use it for automated decision-making or profiling with legal or similarly significant effects.

## 4. Who we share it with

We share personal data only with service providers that process it on our behalf and under our instructions, bound by a data processing agreement:

- **Cloudflare, Inc.** hosts and delivers this website, protects it against attacks and provides Turnstile, the check that keeps automated spam out of our forms.
- **HubSpot, Inc.** is our customer relationship management system. Messages sent through our forms are stored there.
- **Google** (Google Workspace) provides our email, calendar and documents.
- **Xero** is our accounting system, where invoices and customer billing details are kept.
- **Stripe** and **GoCardless** process card payments and direct debits. For their own legal obligations, such as fraud prevention and anti-money-laundering checks, they act as independent controllers under their own privacy notices.

Our client area at dash.noraina.cloud is operated by us.

We may also disclose personal data to professional advisers such as auditors and lawyers, to public authorities when the law requires it, and to a buyer or successor in the event of a merger, acquisition or sale of all or part of our business, who will be bound by this policy. We do not sell personal data.

## **5. Transfers outside the European Economic Area**

Our HubSpot account stores its data in HubSpot's data centre in the European Union. Some of our providers, including Cloudflare, Google and HubSpot, are part of groups based in the United States and may access or process personal data outside the European Economic Area. Where they do, the transfer relies on the EU–U.S. Data Privacy Framework, under which these providers are certified, on an adequacy decision of the European Commission, or on the Commission's Standard Contractual Clauses included in their data processing agreements.

## **6. How long we keep it**

- Enquiries that do not lead to a contract: 24 months after our last contact with you.
- Customer account data and contract records: for as long as the contract is in force and six years after it ends, the period in which contractual claims can be brought under Irish law.
- Invoices and accounting records: six years from the end of the financial year they relate to, as Irish tax law requires.
- Website and security logs: one month.
- Marketing: until you unsubscribe or object.

## **7. Security**

We protect personal data with technical and organisational measures that are part of our information security management system, certified to ISO/IEC 27001:2022. Access is limited to employees, agents and providers who need it for the purposes above. No transmission over the internet is completely secure, so please keep your client area password private.

## **8. Your rights**

You have the right to:

- access the personal data we hold about you and receive a copy;
- have inaccurate data corrected and incomplete data completed;
- have your data erased when there is no longer a reason for us to keep it;
- restrict how we use it while a question about it is resolved;
- receive data you gave us in a machine-readable format (portability);
- object to processing based on our legitimate interests, and to direct marketing at any time;
- withdraw your consent at any time, without affecting processing that took place before.

To exercise any of these rights, email [info@norainacloud.com](mailto:info@norainacloud.com). We will answer within one month and may ask you to confirm your identity first.

If you are not satisfied with our answer, you can complain to the Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland ([www.dataprotection.ie](http://www.dataprotection.ie)), or to the supervisory authority of the EU country where you live or work.

## **9. Cookies**

Our website uses no analytics or advertising cookies and loads no third-party analytics or advertising scripts. The only third-party script is Cloudflare Turnstile, which runs on pages with a form. Our [cookies policy](#) lists the strictly necessary security cookies Cloudflare may set.

## **10. Children**

Our services are for businesses. We do not knowingly collect personal data from children.

## **11. Changes to this policy**

We publish any change to this policy on our website, with a new date at the top. If we plan to use personal data in a way that is significantly different from what this policy describes, we will tell you by email before we do so.

## **12. Contact**

Noraina Ltd, Unit 3D North Point House, North Point Business Park, New Mallow Road, Cork T23 AT2P, Ireland. Email [info@norainacloud.com](mailto:info@norainacloud.com), phone +353 21 204 0104.