PRIVACY POLICY

Effective date: **1 July 2026** Last updated: **1 July 2026**

i r design FZ-LLC (“IRD”, “we”, “us” or “our”) is a boutique interior architecture and design consultancy with its registered office based at Dubai Production City, Dubai, United Arab Emirates. We are committed to protecting the privacy of everyone who visits our website at irdesign.co (the “Website”) or who otherwise shares personal data with us.

This Privacy Policy explains what personal data we collect, how we use and protect it, and the rights you have in relation to it. It is written to align with UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (the “PDPL”) and, where applicable, the EU General Data Protection Regulation (Regulation (EU) 2016/679) (the “GDPR”) and the UK GDPR.

For the purposes of the PDPL and the GDPR, IRD is the “data controller” responsible for your personal data.

1. SCOPE OF THIS POLICY

This policy applies to personal data we collect:

- through our website (www..irdesign.co), including enquiry and contact forms;
- when you email, call or otherwise correspond with us;
- when you apply to work or collaborate with us, or submit a CV, portfolio or expression of interest;
- in the course of providing, or proposing to provide, our design consultancy and advisory services; and
- through cookies and similar technologies, as described in Section 5.

This policy does not apply to third-party websites that may be linked to from our website. Please review the privacy notices on those sites separately.

2. THE PERSONAL DATA WE COLLECT

Information you provide to us

- **Identity and contact details** - your name, company or organisation, job title, email address, telephone number and postal address.
- **Enquiry and project information** - the contents of any message, brief, requirement or other information you choose to share when you contact us or engage our services.

- **Recruitment information**- where you apply for a role or collaboration, your CV, portfolio, qualifications, work history and any details in your application.
- **Correspondence**- records of communications between you and IRD.
- **Financial and transactional information** - invoicing and payment details.

Information we collect automatically

- **Technical and usage data** - your IP address, browser type and version, device information, operating system, referring pages, the pages you view and the dates and times of your visits.
- **Cookie data** - information collected through cookies and similar technologies (see Section 5).

Information from third parties

- We may receive limited information about you from business partners, referrals, publicly available professional sources (such as LinkedIn or company websites) and analytics providers.

We do not intentionally collect “sensitive personal data” (such as data revealing health, religious or political beliefs, or biometric data) through the Website. Please do not submit such information unless we specifically request it and explain why.

3. HOW AND WHY WE USE YOUR PERSONAL DATA

We use personal data only where we have a lawful basis to do so. The table below sets out our main purposes and the corresponding legal bases under the PDPL and the GDPR.

Purpose	Personal data used	Legal basis
Responding to enquiries and providing information you request	Identity, contact, enquiry data	Your consent; steps taken at your request before entering a contract
Providing our design and consultancy services and managing the client relationship	Identity, contact, project, correspondence	Performance of a contract; our legitimate interest in managing client work
Business development and updates about IRD, where you have asked to hear from us	Identity, contact data	Your consent; our legitimate interest in promoting our services
Recruitment and assessing applications	Recruitment data	Steps before a contract; your consent; our legitimate interest in building our team
Operating, securing and improving the Website	Technical, usage, cookie data	Your consent (non-essential cookies); our legitimate interest in a secure, functional site
Complying with legal, regulatory and tax obligations	Any relevant data	Compliance with a legal obligation
Establishing, exercising or defending legal claims	Any relevant data	Our legitimate interest; compliance with a legal obligation

Where we rely on your consent, you may withdraw it at any time (see Section 10). Withdrawing consent does not affect the lawfulness of processing carried out before withdrawal.

Note on legal bases. "Legitimate interests" is a GDPR concept. Under the PDPL, processing is generally based on your consent unless one of the limited exemptions in the law applies; for example, where processing is necessary to perform a contract with you, to comply with a legal obligation, or to protect legitimate interests in a way that does not prejudice your rights.

▪ 4. MARKETING COMMUNICATIONS

We will only send you marketing communications about IRD where you have agreed to receive them or where we are otherwise permitted to do so. You can opt out at any time using the unsubscribe link in our emails, or by contacting us at **contact@irdesign.co**.We do not sell your personal data.

▪ 5. COOKIES AND SIMILAR TECHNOLOGIES

The Website uses cookies and similar technologies to function correctly, to remember your preferences and to understand how visitors use the site.

- Essential cookies are necessary for the Website to operate and cannot be switched off in our systems.
- Analytics cookies help us understand how visitors interact with the Website **e.g. Google Analytics**.
- **Functionality / embedded-content cookies** - e.g. embedded video, maps or social media;.

You can control non-essential cookies through our cookie banner and through your browser settings. Blocking some cookies may affect how the Website works. For more detail, see our **Cookie Policy**.

▪ 6. SHARING YOUR PERSONAL DATA

We treat your personal data as confidential and share it only where necessary, with:

- Service providers who support our business - for example IT, cloud hosting, email, website and analytics providers who process data on our behalf under appropriate confidentiality and data-protection terms;
- Professional advisers such as lawyers, accountants and insurers, where required;
- Project partners, consultants or contractors, where necessary to deliver a project you are involved in, on a need-to-know basis;
- Authorities and regulators, or other parties, where we are required to do so by law or to establish, exercise or defend legal claims.

We do not sell or rent your personal data.

▪ 7. INTERNATIONAL DATA TRANSFERS

IRD is based in the UAE and works with clients and partners across the GCC, India, Africa and beyond. Your personal data may therefore be transferred to, stored in, or processed in countries outside your own, including outside the UAE and the European Economic Area (the "EEA").

Where we transfer personal data internationally, we take steps to ensure it remains protected, including by:

- transferring to countries recognised as providing an adequate level of data protection;

- putting in place appropriate safeguards; such as contractual protections (for example, the EU Standard Contractual Clauses or equivalent terms) requiring the recipient to protect your data to standards consistent with the PDPL and the GDPR; or
- relying on another lawful transfer mechanism, including your explicit consent where permitted.

You may contact us for more information about the safeguards we use.

8. HOW LONG WE KEEP YOUR DATA

We keep personal data only for as long as necessary for the purposes for which it was collected, including to satisfy any legal, accounting, tax or reporting requirements.

- Enquiry data is generally retained for **12 months** from your last contact, unless we go on to work together.
- Client and project records are retained for the duration of our engagement and for **up to 5 years** afterwards, in line with legal and professional requirements.
- Recruitment data for unsuccessful applicants is retained for **12 months**.

When personal data is no longer needed, we securely delete or anonymise it.

9. HOW WE PROTECT YOUR DATA

We use appropriate technical and organisational measures to protect personal data against unauthorised access, loss, misuse or alteration. These include access controls, secure cloud services, encryption in transit, staff confidentiality obligations and a need-to-know approach to access. No method of transmission over the internet is completely secure, so we cannot guarantee absolute security, but we work to protect your data and maintain procedures for dealing with any suspected breach.

10. YOUR RIGHTS

Subject to the conditions and exemptions in applicable law, you have the following rights in relation to your personal data.

Under the UAE PDPL, you have the right to:

- be informed about how your personal data is processed;
- request access to, and a copy of, your personal data;
- request the correction of inaccurate or incomplete data;
- request the deletion of your personal data;
- restrict or stop certain processing of your data;
- request that your data be transferred to you or another controller in a structured format;
- object to processing, including for direct marketing or based on automated decision-making; and
- withdraw your consent at any time, where processing is based on consent.

If you are in the EEA or the UK, the GDPR and UK GDPR give you equivalent rights, including access, rectification, erasure, restriction, data portability, objection, and rights relating to automated decision-making. You also have the right to lodge a complaint with your local data protection authority.

We will not usually charge a fee to deal with a request, and we aim to respond within the timeframes required by applicable law. We may need to verify your identity before acting on a request.

11. CHILDREN'S PRIVACY

The Website is intended for business and professional audiences and is not directed at children. We do not knowingly collect personal data from children. If you believe a child has provided us with personal data, please contact us so we can delete it.

12. THIRD-PARTY LINKS

The Website may contain links to third-party websites, plug-ins and services, including social media platforms. We are not responsible for the privacy practices or content of those third parties. We encourage you to read the privacy notice of every website you visit.

13. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices or in the law. The "Last updated" date at the top shows when it was last revised. Where changes are significant, we will take reasonable steps to bring them to your attention.

14. HOW TO CONTACT US AND MAKE A COMPLAINT

If you have any questions about this Privacy Policy, or wish to exercise your rights, please contact us:

i r design FZ-LLC
P O Box 31940
Email: **contact@irdesign.co**
Telephone: **+971 56 559 9696**
If you have a concern about how we handle your personal data, we would like the chance to resolve it. You also have the right to complain to the competent supervisory authority:

- In the UAE, the federal authority responsible for the protection of personal data.
- In the EEA or the UK -your local data protection authority.