

# Doera

# GDPR Compliance Policy

Data Protection Rights and Obligations Under EU Law

Effective Date: 26 February 2026 | Version 1.0 | Governing Law: Luxembourg

This GDPR Compliance Policy sets out Doera's obligations and commitments as a data controller under Regulation (EU) 2016/679 ("GDPR") and the Luxembourg Law of 1 August 2018 on the organisation of the National Commission for Data Protection. This document is intended to supplement our Privacy Policy and provide Users with detailed information about their data protection rights and our legal framework for processing personal data.

## 1. Data Controller Details

Doera S.A. acts as the data controller in respect of personal data processed through the Doera platform. As data controller, we determine the purposes and means of processing personal data in accordance with Article 4(7) GDPR.

### Contact for Data Protection Matters:

Email: [privacy@doera.eu](mailto:privacy@doera.eu)

Address: Doera S.A., Luxembourg (full registered address available upon request)

Data Protection Officer: To be designated where required by Article 37 GDPR.

## 2. Legal Bases for Processing (Article 6 GDPR)

Doera processes personal data only where a lawful basis under Article 6 GDPR exists. The applicable bases are as follows:

**Art. 6(1)(a) — Consent:** For non-essential cookies, optional analytics, and marketing communications. Consent is freely given, specific, informed, and unambiguous, and may be withdrawn at any time.

**Art. 6(1)(b) — Contract Performance:** For all processing strictly necessary to provide the platform's core services, including account management, job matching, payment escrow, and User communications.

**Art. 6(1)(c) — Legal Obligation:** For processing required to comply with applicable EU and Luxembourg laws, including tax and accounting obligations, anti-money laundering requirements, and regulatory reporting.

**Art. 6(1)(f) — Legitimate Interests:** For fraud prevention, platform security, service improvement, and business analytics, subject to a balancing test confirming that such interests are not overridden by Users' rights and freedoms.

## 3. Data Subject Rights and Fulfilment Procedures

Doera is committed to honouring all data subject rights under Chapter III of the GDPR. All requests should be submitted to [privacy@doera.eu](mailto:privacy@doera.eu). We will verify your identity before processing any request and will respond within one (1) calendar month, extendable to three (3) months for complex or multiple requests, with prior notice.

### **Right of Access — Article 15**

You are entitled to receive confirmation of whether we process your personal data, and if so, to receive a copy thereof along with supplementary information regarding the processing activities.

### **Right to Rectification — Article 16**

You may require that we correct without undue delay any inaccurate personal data we hold about you, and complete any incomplete data.

### **Right to Erasure ("Right to be Forgotten") — Article 17**

You may request erasure of your personal data where: (i) the data is no longer necessary for its original purpose; (ii) you withdraw consent; (iii) you successfully object to processing; (iv) data was unlawfully processed; or (v) erasure is required by EU or Member State law. Erasure may be restricted where processing is required for legal compliance, public interest, or establishment or defence of legal claims.

### **Right to Restriction of Processing — Article 18**

You may request restriction of processing where: (i) accuracy of the data is contested; (ii) processing is unlawful but you oppose erasure; (iii) we no longer need the data but you need it for legal claims; or (iv) you have objected to processing pending verification.

### **Right to Data Portability — Article 20**

Where processing is based on consent or contract and carried out by automated means, you may receive your personal data in a structured, commonly used, and machine-readable format, and transmit it to another controller.

### **Right to Object — Article 21**

You may object at any time to processing based on legitimate interests, including profiling. We shall cease processing unless we demonstrate compelling legitimate grounds that override your interests, rights, and freedoms, or the processing is for legal claims. Where processing is for direct marketing, you have an unconditional right to object.

### **Rights in Relation to Automated Decision-Making — Article 22**

You have the right not to be subject to decisions based solely on automated processing, including profiling, that produce legal or similarly significant effects, unless such processing is necessary for a contract, authorised by law, or you have provided explicit consent.

## **4. International Data Transfers — Article 44–49 GDPR**

Where Doera transfers personal data to third countries outside the EEA, such transfers shall only occur where one or more of the following conditions are met:

- The European Commission has issued an adequacy decision in respect of the recipient country (Art. 45);

- Appropriate safeguards have been implemented, including Standard Contractual Clauses (SCCs) as approved by the Commission (Art. 46);
- Binding Corporate Rules (BCRs) have been approved by a competent supervisory authority (Art. 47);
- An approved code of conduct or certification mechanism applies (Art. 46(2)(e) and (f));
- A derogation under Article 49 applies, such as explicit User consent or contract performance necessity.

## 5. Data Protection Officer (DPO)

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Doera shall designate a Data Protection Officer where required under Article 37 GDPR. The DPO shall be responsible for ensuring compliance with the GDPR, acting as a point of contact for supervisory authorities and data subjects, and advising on data protection impact assessments. DPO contact details shall be published and notified to the CNPD.

## 6. Data Protection Impact Assessments (DPIA) — Article 35

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Where a type of processing is likely to result in a high risk to the rights and freedoms of natural persons, Doera shall carry out a Data Protection Impact Assessment (DPIA) prior to commencing such processing. DPIAs shall be reviewed periodically and where the nature, scope, or purpose of the processing changes materially.

## 7. Data Breach Notification — Articles 33–34

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In the event of a personal data breach, Doera shall notify the CNPD without undue delay and, where feasible, within seventy-two (72) hours of becoming aware of the breach, in accordance with Article 33 GDPR. Where the breach is likely to result in a high risk to Users' rights and freedoms, affected Users shall also be notified without undue delay under Article 34 GDPR.

## 8. Supervisory Authority and Right to Complaint

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The competent supervisory authority for Doera's data processing activities is:

Commission Nationale pour la Protection des Données (CNPD) 15, Boulevard du Jazz — L-4370 Belvaux  
— Luxembourg Tel: +352 26 10 60 1 | Email: info@cnpd.lu | Website: www.cnpd.public.lu

You have the right to lodge a complaint with the CNPD at any time if you believe that Doera's processing of your personal data infringes the GDPR. You may also seek a judicial remedy before the competent courts of Luxembourg.

## 9. Accountability and Record-Keeping — Article 30

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Doera maintains a Record of Processing Activities (RoPA) as required by Article 30 GDPR, documenting the purposes of processing, categories of data, recipients, international transfers, retention periods, and security measures. This record is made available to the CNPD upon request.