Doera

Privacy Policy

How We Collect, Process, and Protect Your Personal Data

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

This Privacy Policy explains how Doera S.A. ("Doera", "we", "us", or "our") collects, processes, stores, and protects your personal data in accordance with Regulation (EU) 2016/679 (the General Data Protection Regulation, "GDPR") and applicable Luxembourg data protection law. Please read this Policy carefully before using our platform.

1. Data Controller

The data controller responsible for the processing of your personal data is Doera S.A., a company incorporated under Luxembourg law. For all data protection enquiries, Users may contact our Data Protection Contact at: **privacy@doera.eu**. A Data Protection Officer (DPO) will be appointed where required by applicable law.

2. Categories of Personal Data Collected

We collect the following categories of personal data:

Account & Identity Data: Full name, email address, password hash, profile photo, age range, and registration date.

Profile & Service Data: Services offered or requested, biography, skills, availability, and hourly rate.

Location Data: City, postal code, and general geographic location for the purpose of facilitating hyperlocal matching. We do not collect real-time GPS tracking data without explicit consent.

Communication Data: Messages exchanged between Users via the platform's messaging system, support communications, and notification preferences.

Financial & Payment Data: Transaction records, escrow payment history, and earnings data. Full payment card details are processed solely by our PCI-DSS compliant third-party payment processor. We do not store raw card data.

Technical & Usage Data: IP address, browser type, device identifiers, session data, page views, and clickstream data for platform performance and security purposes.

Reviews & Ratings: Feedback and ratings submitted by or about Users in connection with completed jobs.

3. Legal Bases for Processing

Contract Performance (Art. 6(1)(b) GDPR): Processing necessary to create and manage your account, match Helpers with Homeowners, and facilitate payment transactions.

Legal Obligation (Art. 6(1)(c) GDPR): Processing required to comply with applicable laws, tax obligations, and regulatory requirements.

Legitimate Interests (Art. 6(1)(f) GDPR): Processing for fraud prevention, platform security, service improvement, and analytics, where these interests are not overridden by your fundamental rights.

Consent (Art. 6(1)(a) GDPR): Processing for non-essential cookies, marketing communications, and any additional purposes where we request your explicit opt-in consent.

4. Purposes of Data Processing

- Registering and authenticating User accounts;
- Matching Helpers with Homeowners based on location and service requirements;
- Facilitating secure escrow payments and processing transactions;
- Enabling communication between Users via the platform messaging system;
- Providing customer support and resolving disputes;
- Sending transactional notifications, service updates, and safety alerts;
- Detecting and preventing fraud, abuse, and unauthorised access;
- Ensuring compliance with legal and regulatory obligations;
- Improving platform functionality through anonymised analytics.

5. Data Sharing and Third-Party Disclosures

We do not sell your personal data to any third party. We may share your data with:

Payment Processors: PCI-DSS compliant payment service providers for escrow processing, subject to binding data processing agreements.

Cloud Infrastructure Providers: Hosting and database service providers operating under appropriate contractual safeguards.

Identity Verification Services: Third-party verification providers where Users consent to identity checks.

Legal and Regulatory Authorities: Competent courts, regulatory bodies, or law enforcement agencies where required by applicable law or a valid legal order.

Business Transfers: In the event of a merger, acquisition, or sale of assets, your data may be transferred to a successor entity, subject to equivalent data protection obligations.

6. International Data Transfers

Personal data is primarily processed within the European Economic Area (EEA). Where data is transferred to a country outside the EEA, Doera shall ensure that such transfer is protected by adequate safeguards including Standard Contractual Clauses (SCCs) approved by the European Commission, adequacy decisions, or equivalent lawful mechanisms as required by GDPR Chapter V.

7. Data Retention

We retain personal data only for as long as is necessary to fulfil the purposes for which it was collected, including compliance with legal, accounting, and reporting obligations. Account data is retained for the duration of the active account plus a period of five (5) years following account closure for legal compliance purposes. Transaction records are retained for ten (10) years in accordance with Luxembourg tax law. Upon expiry of the applicable retention period, personal data is securely deleted or irreversibly anonymised.

8. Your Data Subject Rights

Under the GDPR, you have the following rights in respect of your personal data:

Right of Access (Art. 15): You may request a copy of the personal data we hold about you.

Right to Rectification (Art. 16): You may request correction of inaccurate or incomplete data.

Right to Erasure (Art. 17): You may request deletion of your data where there is no overriding legal basis for its continued processing.

Right to Restriction of Processing (Art. 18): You may request that we limit processing of your data in certain circumstances.

Right to Data Portability (Art. 20): You may request your data in a structured, machine-readable format.

Right to Object (Art. 21): You may object to processing based on legitimate interests or for direct marketing purposes.

Right to Withdraw Consent (Art. 7(3)): Where processing is based on consent, you may withdraw it at any time without affecting the lawfulness of prior processing.

To exercise any of these rights, please contact us at privacy@doera.eu. We will respond within one (1) calendar month of receipt of your request. You also have the right to lodge a complaint with the Luxembourg data protection supervisory authority, the **Commission Nationale pour la Protection des Données (CNPD)**, at www.cnpd.public.lu.

9. Data Security

Doera implements appropriate technical and organisational security measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access. These measures include TLS/SSL encryption, password hashing, access controls, and regular security assessments. Notwithstanding our efforts, no data transmission over the internet is entirely secure, and we cannot guarantee absolute security.

10. Changes to this Privacy Policy

We reserve the right to update this Privacy Policy at any time. Material changes will be communicated to registered Users by email or in-platform notification at least thirty (30) days before taking effect. The current version of this Policy is always available at doera.eu/privacy. Continued use of the platform after the effective date constitutes acceptance of the revised Policy.