

# Privacy Policy

## PRIVACY POLICY FOR PERSONAL DATA OF USERS OF THE WEBSITE OF C.VIOLARIS (C.P.S) LTD

### 1. INTRODUCTION

1.1 This Privacy Policy (the “Policy”) set out below will govern the protection and processing of your personal data that is collected or submitted, by using the website <https://www.violaris.com.cy/> (the “Website”) (regardless of where you visit it from).

1.2 The Website is owned and operated by C.VIOLARIS (C.P.S) LTD with registration number HE 213470 and registered address at 6 Pireos Str, Latsia, 2540 Nicosia, Cyprus. (“we”, “our”, “us”).

1.3 Please read this Policy carefully. By submitting your acceptance on the relevant notifications posted on the Website, you are deemed to have read, understood, agreed to and consented to the Policy.

1.4 It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### Controller

1.5 We are the data controllers of your personal data. It should be noted however that any information (including personal data) submitted to the Website by a user, will be handled and transmitted to us through our third-party service providers for information technology services with regards to the Website, who will only handle your personal data for the purpose of providing their services to us and only for as long as it is necessary.

### 2. COLLECTION OF PERSONAL DATA

We will only use your personal data when the law allows us to. We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Data retention: How long will you use my personal data for?

We will retain your personal data only 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 unauthorized 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.

#### **TYPES OF DATA**

Name

Surname

Telephone number

Email address

District

Types of products for which a quotation is requested

Contents of communication text

#### **DATA SUBJECT**

Website user

#### **LEGAL BASIS FOR PROCESSING**

(i) to take steps upon the request of the data subject before entering into a contract,

(ii) for the purposes of our legitimate interests in responding to a data subject's request for a reply to communication and to provide information or a quotation to a website user

(iii) to carry out the contract in the event that the quotation is accepted

(iv) for the purposes of our legitimate interests in providing

services/products

(v) in order to comply with our legal obligations

### **RETENTION PERIOD**

(i) In the event that the quotation is rejected, the data is deleted 6 months after the date of rejection.

(ii) In the event that no response is received, the data is deleted 6 months after the date of sending the quotation.

(iii) In the event that the quotation is accepted, the data is deleted 7 years after the date of full settlement of any pending payment between the company and the client, unless it is necessary for the data to be retained according to a legal obligation or a court order or for the purpose of using the data in any pending or threatened court procedure or other type of procedure between the company and the client or for the purpose of safeguarding the legitimate interests of the company.

### **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. You can view our cookie policy below.

### **Change of purpose**

We will use your personal data only for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

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.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

**Direct interactions:** You may give us your name, surname, telephone, email by contacting us through the post, telephone, e-mail or through any other means. This includes personal data you provide when you communicate with us.

**Automated technologies or interactions:** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies. Please see our cookie policy below for further details.

**Third parties or publicly available sources:** We will receive personal data about you from various third parties such as analytics providers.

### 4. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with 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.

#### **5. INTERNATIONAL TRANSFERS**

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

In case we do transfer your data outside of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least that we use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

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

#### **6. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized 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.

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.

#### **7. CHANGES TO THE POLICY**

We reserve the right, at our discretion, to make changes to any part of this Policy. Should this Policy be amended, we will publish details of the amendments on the Website and we will post a notice on the Website to request your acceptance of the amended Policy.

#### **8. THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our

website, we encourage you to read the privacy policy of every website you visit.

**9. SEVERABILITY**

If this Policy or any part of it should be determined to be illegal, invalid or otherwise unenforceable under the laws of any country in which this Policy is intended to be effective, then to the extent that it is determined to be illegal, invalid or unenforceable, it shall in that country be treated as severed and deleted from this Policy and the remaining terms of this Policy shall survive and remain in full force and effect and continue to be binding and enforceable in that country.

**10. EVENTS BEYOND OUR CONTROL**

We are not be responsible for any breach of this Policy caused by circumstances beyond its reasonable control.

**11. PERSONS UNDER THE AGE OF 16**

The Website is a general audience website that is not designed nor intended to collect personal data of persons under the age of 16. Persons under the age of 16 should not provide any personal data on this Website. We ask that parents supervise their children while online.

**12. THE RIGHTS OF WEBSITE USERS WHO SUBMIT PERSONAL DATA THROUGH THE WEBSITE**

If you submit or have already submitted to us, personal data about you through the Website, then you have the following rights under this Policy and the relevant legislation on the protection on personal data.

You may at any time cancel the consent you have given us to process your personal data

You may at any time send us any of the following requests:

- A request for us to permanently delete all or some of your personal data from our records.
- A request for you to access your personal data that are in our records.
- A request for us to provide you with a copy of your personal data that are in our records, in digital or hard copy form.
- A request for us to update or correct your personal data that are in our records.
- A request for us to forward to another party of your choosing, a copy of all or some of your personal data that are in our records.
- A request for us to limit what we do with your personal data or to stop all processing of your personal data.

– If you wish to exercise any of the above rights or if you wish to notify us of a breach of your personal data, you will be able to do so by contacting us here

You also have a right to lodge a complaint with the supervisory authority, The Office of the Commissioner for the protection of personal data, however we would appreciate the chance to deal with your concerns before you approach the supervisory authority.

At any time after providing your consent, you will have a right to withdraw it by visiting any of our stores or by contacting us electronically or in writing using the above contact details.

Please keep in mind that if you wish to exercise any of the above rights in relation to any processing that is necessary to fulfill a contractual obligation based on the agreement between us or in relation to processing that is necessary to fulfill a legal obligation or in relation to processing that is necessary to safeguard the legitimate interests of the company, then we will examine your request by taking into consideration the need to comply with our obligations and the effect on our ability to continue collaboration within the bounds set by the agreement between us, the relevant law and our legitimate interests.

To examine a request or a notification of data breach or a withdrawal of consent, we will request proof that the person submitting such, is the same as the person to which the data refers or that the person is a duly authorized representative. The personal data that will be processed for the purposes of submitting, examining and responding to such a request or a notification of data breach or a withdrawal of consent, shall be retained for a period of one year from the data any related procedure is finalized, or for a period of three months after the expiry of the initial retention period, whichever period is largest.

The competent authority in Cyprus for the enforcement of personal data protection legislation is:

The Office of the Commissioner for the protection of personal data

Address: Iasonos 1, 1082 Nicosia Cyprus or P.O.Box 23378, 1682 Nicosia Cyprus

Telephone: +357 22818456

Fax: +357 22304565

Email: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)

## Cookies Policy

Note: General information about cookies

Cookies are text files containing small amounts of information which are downloaded to your computer or mobile device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie.

If you do not accept the use of cookies please disable them by changing your browser settings so that cookies from this website cannot be placed on your computer or mobile device. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

### Types of cookies:

**Strictly necessary cookies:** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.

**Analytical/Performance Cookies:** They allow us to recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

**Functionality cookies:** These are used to recognize you when you return to our website. This enables us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

**Targeting Cookies:** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

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