

## PRIVACY POLICY

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## ABOUT US

Business Consulting Support Cyprus Ltd respects your privacy and protecting your information is paramount. We want you to be informed and empowered with respect to your privacy when you use our services. Please read this Privacy Notice carefully before using our website or apps or registering to use our services. We set out our views and practices regarding your personal data and how we use, process and treat the personal data you provide to us.

The data controller of your personal data is Business Consulting Support Cyprus Ltd 7 Panagioti Anagnostopoulou, Kato Polemidia, 4152 Limassol, Cyprus. We use your information as further explained in this Privacy Notice.

For further information about our use of your personal data, or your rights under data protection law, please contact [support@bcsce.com](mailto:support@bcsce.com).

## WHAT INFORMATION DO WE COLLECT?

### **We may collect and process the following data about you:**

Information you give us. You may give us information about you when you submit a ticket on our website or by communicating with us by phone, email, social media or otherwise. This includes information you provide when you create a customer account, use our services, support also fill up our service report

request form, provide us with feedback, participate in surveys, and when you report a problem with our website. The information you give us may include your name, address, email address, phone number, pin number, password, serial number, date of birth, and credit or debit card details. Moreover, in case of any backup what you request we will back up all of your data what you keep on your device (phone, laptop, tablet) and restore it for you or do whatever you request with it which may include more personal information from you.

Recording telephone calls and other communications. We may monitor or record telephone conversations or other communications between you and us.

We use the information described above for the purposes set out in the How do we use your information? section below.

## HOW DO WE USE YOUR INFORMATION?

### **We will use this information:**

- (a) to administer our service and for internal operations, including troubleshooting, data analysis, testing, research and statistical purposes;
- (b) to improve the service, we offer you and to try and ensure that you get the best from our team, ensuring that content is tailored and presented in the most effective manner for you and for the devices you use;
- (c) as part of our efforts to keep our service safe and secure;
- (d) to make suggestions and recommendations to you about products or services that may interest you.

### **Recording telephone calls and other communications**

We will use telephone recordings or transcripts of communications to check your instructions to us, analyze, assess and improve our services to customers, for training and quality purposes and for the purposes of investigating any complaint you may make, or as evidence in any dispute or anticipated disputes between you and us.

## **Marketing**

We offer you the opportunity to receive marketing information from us. We will normally send direct marketing by email if we have your email address, but may choose to contact you via other methods, if you have provided your consent for us to market to you using these methods.

If you consented to receive marketing communications when you registered and created a customer account, you can tell us that you do not wish to receive any more at any time by selecting the 'unsubscribe' option in the marketing communications we send or at any time by changing your account preferences.

## **WHO DO WE SHARE YOUR INFORMATION WITH?**

In addition to sharing your information with other members of our group (including our subsidiaries and affiliated companies, suppliers, subcontractors), we may need to disclose your data to third parties in order to ensure that we can provide you with our services and to ensure effective operation of our website and the apps.

### **We may share your information with the following third parties:**

- (a) business partners, third party suppliers and our subcontractors (including delivery companies, payment providers and fraud prevention providers) to enable us to provide our services, operate our websites and to detect and prevent fraudulent transactions;
- (b) where we buy or sell any businesses or assets, we may disclose your information to the prospective buyer or seller (or their advisers) or if part or all of our assets or business are acquired by a third party, our customer data will be one of the assets transferred;
- (c) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our internal policies and other agreements; and
- (d) to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

## ENSURING THAT USE OF YOUR INFORMATION IS LAWFUL

We take appropriate measures to ensure that all processing of your personal information by us, or by our service providers, is lawful. The lawful basis for the processing of your personal information will depend on the purposes for which we process your information.

Much of the personal information we collect from you is necessary for us to provide our services to you in line with our internal policies. This includes most of the information you provide to us when setting up a customer account or requesting any service or maintenance.

We require your consent to process information we process for marketing purposes and to maintain your customer account with us. You don't have to provide your consent and can withdraw it at any time. However, if you do not provide us with consent to maintain a customer account, your account on our website and access to the associated services will be suspended or terminated. There are no consequences of withdrawing your consent for marketing purposes.

Finally, sometimes we also need to process your personal information to comply with our legal obligations. This includes in relation to fraud prevention, sanctions screening checks, complaints and investigations or litigation.

For information about your rights, see [Your Privacy rights](#) (which forms part of this Privacy Notice).

## WHERE DO WE SEND YOUR INFORMATION?

We may transfer your personal information inside of the European Economic Area (EEA) to other companies, and to external suppliers based inside of the EEA. The EEA comprises those countries that are in the European Union (EU) and some other countries that are considered to have adequate laws to ensure personal information is protected.

We take the security of your personal data seriously. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access, loss or damage.

## HOW LONG DO WE KEEP YOUR INFORMATION?

How long we keep your information will depend on the purpose for which we use it. While you are a customer of ours, we will only retain your information for as long as is necessary for those purposes.

If your agreement is terminated (by you or us), we will keep your information for a period of up to 7 years after termination (unless a longer period is prescribed by law) for the purposes of responding to legal disputes and legal or regulatory enquiries or investigations.

During and after expiry of this period, we will continue to use data which does not identify individual users in an aggregated form. We use this aggregated data for data analysis, trend identification and research purposes, for example to gain insights about our users and to make improvements to our services.

## MAKING A COMPLAINT

If you are not satisfied with how we've handled your information, please contact us at Business Consulting Support Cyprus Ltd via [support@bcsce.com](mailto:support@bcsce.com).

If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Office of the Elia & Elia at 339, Saint Andrew Street, Andrea Chambers, 2nd Floor, Office 205 – 207, Limassol, Cyprus or on its website at [www.eliallc.com](http://www.eliallc.com).

## YOUR PRIVACY RIGHTS

This section explains your rights in relation to your personal information in more detail. The various rights are not absolute and are subject to certain exceptions or qualifications.

We will respond to your requests in respect of your personal information free of charge (except in the following circumstances, where we may charge a reasonable fee to cover our administrative costs or may be entitled to refuse to respond:

- manifestly unfounded or excessive/repeated requests, or
- further copies of the same information).

Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll let you know.

In order to exercise any of the rights described below, please contact us at Business Consulting Support Cyprus Ltd via [support@bcsce.com](mailto:support@bcsce.com).

Further information and advice about your rights can be obtained from the Elia & Elia using the contact details in the 'Making a complaint' Section above.

### **Accessing your information**

### **Correcting your information**

### **Erasing your information**

### **Restricting processing of your information**

### **Taking your personal data with you**

### **Objecting to processing**

### **Accessing your information**

What can you request access to?

You have the right to:

- receive confirmation from us that your personal information is being processed;
- access to your personal information; and
- certain other details in relation to how we use your personal information (which is generally included in our Privacy Notice anyway).

You can request copies of paper and electronic records (including recorded calls, where applicable) about you that we hold, share or use. To deal with your request, we can ask for proof of your identity and enough personal information about you to enable us to locate the personal information you have requested.

When will access not be provided?

We can only provide you with your personal information, not personal information about another person. Also, where access would negatively affect another person's rights, we're not required to provide this. Due to legal privilege, we may not be able to show you anything that we learned in connection with a claim or legal proceeding.

When requesting access to your personal information, to help us respond to your request quickly, please clearly set out in your request the personal information that you would like. If this is not clear, we may need to ask for further information from you by way of clarification.

### **Correcting your information**

You have the right to require us to correct inaccurate personal information that we hold about you.

If you tell us that the personal information we hold on you is incorrect, we will review it and if we agree with you, we will correct our records. If we do not agree with you, we will let you know. If you believe the records we hold on you are still incorrect, you can let us know in writing, and we will include your statement when we give your personal information to any third parties.

If you believe that we hold incomplete personal information about you, you may also have the right to have the information completed, including by providing a supplementary statement. Whether or not this right applies will depend on the purposes for which your personal information is being processed.

We need to notify any third parties with whom we have shared your personal information that you have made a correction request (see [Who do we share your information with?](#)). We will take reasonable steps to do this, but if it is not possible or costly we may not be able to do so.

### **How You Can See and Correct Your Information?**

Generally, if you ask us in writing, we will let you see the personal information that we hold about you, and/or take steps to correct any inaccurate information.

Due to legal privilege, we may not be able to show you anything that we learned in connection with a claim or legal proceeding.

## **Erasing your information**

When can you request deletion of your personal information?

Subject to the section below When can we refuse erasure requests? You have a right to have your personal information erased, and to prevent further processing of your personal information, where:

- the personal information is no longer necessary for the purpose it was originally collected/processed,
- you withdraw your consent (where consent was previously provided and required for us to process the information),
- you object to the processing, as long as our legitimate interests in processing your personal information don't take priority over your objection,
- we've been processing your personal information unlawfully, or
- your personal information has to be erased in order to comply with a legal obligation.

When can we refuse erasure requests?

The right to erasure does not apply where your information is processed for certain specified reasons, including to establish, exercise or defend legal claims.

More importantly, if we have to erase your data we will not be able to continue to provide you with our services, so please carefully consider any request to erase your personal information.

Do we have to tell other recipients of your personal data about your erasure request?

If you request that your personal information is deleted, and we have provided that information to any third parties (see Who do we share your information with?), we need to inform them about your erasure request, so they can also erase the personal information in question. We will take reasonable steps to do this, but it may not always be possible.

Third parties can also refuse erasure requests if one of the exemptions above applies (for example where third parties need your information to establish, exercise or defend legal claims).



## **Restricting processing of your information**

When is restriction available?

You have the right to restrict the processing of your personal information:

- where you consider the information, we hold to be inaccurate, in which case we have to restrict any processing while we verify the accuracy of your personal information,
- when the processing we are carrying out is unlawful and you request us to restrict processing, rather than erasing your personal information,
- if we no longer need the personal information, but you need it to establish, exercise or defend a legal claim, or
- while we are considering our legitimate interests for processing your personal information to which you have objected in the circumstances detailed in paragraph (a) of Objecting to processing.

What happens while processing is restricted?

We can store your personal information, but we cannot carry out any further processing of it without your consent (unless processing is required in connection with legal claims, to protect another person's rights or on important public interest grounds).

Do we have to tell other recipients of your personal data about the restriction?

Where we have disclosed your relevant personal information to third parties, we need to inform them about the restriction on the processing of your information, so that they do not continue to process it.

We'll take reasonable steps to do this, but it may not always be possible.

We will also let you know if we decide to lift a restriction on processing.

## **Taking your personal data with you**

When does the right to data portability apply?

The right to data portability only applies:

- to personal data you've provided to us (i.e. not any other information),
- where we are processing your personal information because you have provided your consent for us to do so, or under a contract with you; and
- when processing is carried out by automated means.

When can we refuse requests for data portability?

We can refuse your data portability request if the processing does not satisfy the above criteria. Also, if the personal information concerns more than one individual, we may not be able to transfer the information to you if doing so would prejudice the other person's rights.

### **Objecting to processing**

You can object to processing in the following circumstances:

(a) Legitimate interests

You have the right to object at any time to processing of personal information concerning you which is carried out because of our legitimate interests.

If we can show compelling legitimate grounds for processing your personal information which override your interests, rights and freedoms, or we need your personal information to establish, exercise or defend legal claims, we can continue to process it. Processing of your personal information will be restricted while we make this assessment (see Restricting processing of your information). Otherwise, we must stop using the relevant personal information.

(b) Direct marketing

You can object at any time to your personal information being used for direct marketing purposes (including profiling related to such direct marketing).

If you sign up to receive email marketing from us, you can opt-out at any time free of charge by clicking the unsubscribe link at the bottom of the message. You may also choose to opt-out from receiving marketing materials from us at any time by updating your account settings or contacting us using the details in our Privacy Notice under the section headed Marketing