



V.L Toolbox Express Computer Solutions Ltd

## Privacy Policy

## Introduction

VL Toolbox Express Computer Solutions Ltd (hereinafter referred to as the Company, “we”, “us”) attaches great importance to the protection of your Personal Data and your privacy when collecting and processing information about you. We hereby assure you that this Privacy and Personal Data Protection Policy (“Policy”) fully respects and complies with EU Regulation 679/2016 (“Regulation”) and the relevant Law 125 / I / 2018 of the Republic of Cyprus.

## Definitions

*Personal Data* means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such (indicatively) as a name, an identification number, age, address, occupation, marital status, contact details, education, work, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

*Processing* means any operation or set of operations which is performed on personal data or on sets of personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

*Personal data breach* means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

*Controller* means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

*Processor* means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

*Third party* means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

## The Controller

Regarding the personal data in cases we determine the purposes and means of the processing, the Controller is the legal person, VL Toolbox Express Computer Solutions Ltd, 45 Nikos G. Demetriou Street, 1st Floor, PC. 6031 Larnaca, Cyprus, phone 24828668, e-mail: [office@vltoolbox.com.cy](mailto:office@vltoolbox.com.cy).

## Principles we adhere to

At V.L Toolbox Express Computer Solutions Ltd, we are committed to and adhering to the following principles of processing personal data in accordance with Article 5 of the Regulation. The personal data are:

- processed lawfully, fairly and in a transparent manner in relation to the data subject (principle of ‘lawfulness, fairness and transparency’);
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (principle of ‘purpose limitation’);
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (principle of ‘data minimisation’);

- accurate and, where necessary, kept up to date; we take every reasonable step to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (principle of 'accuracy');
- kept in a form which permits identification of data subjects for no longer than it is necessary or as required by relevant Laws (principle of 'storage limitation');
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures (principle of 'integrity and confidentiality').

Finally, we at V.L Toolbox Express Computer Solutions Ltd are able to demonstrate compliance with the aforementioned principles (principle of 'accountability').

## **When we collect Personal Data**

We collect personal data about you in the following cases:

- When you contact us directly, or through our website and email, or through our affiliates, or social media, for information, or to request information about the products and services we offer or when you visit our facilities.
- If you purchase products and services from us or are involved in events related to the sale of products and services.
- When completing any of our documents in paper or electronic form.
- When you cooperate with us or if your data is transmitted to us by third parties - partners under contracts or agreements.
- When you connect to our wireless network via Wi-Fi.
- When we evaluate you in order to improve our services.
- When you contact us directly, through our website or through ads we have posted on other websites or in the press, for a job posting your CV.
- Curriculum are accepted only after a job opening or job announcement and through a specified email address.
- When you work with us.

In addition, it is noted that we process personal data, which third parties, usually legal entities, disclose to us if we act as Processors on their behalf.

We process personal data for the purposes set out below.

## **Minors' Privacy**

We do not collect personal information about minors without verifiable parental consent in cases where we can control it. For example, it is not possible to control information that is communicated to us online. In any event, if we find that we have collected any personal information from a minor without verifiable parental consent (in accordance with Article 8), we will delete the information from our records immediately. If you believe we may have collected information from a minor, please contact our company.

## Kind of Personal Data we collect about you

Data from the following categories of personal information about you may be collected and processed as described in this Policy:

- Contact information of you or any person you may indicate (name, address, telephone or fax number, e-mail),
- Occupational status information (occupation or job),
- Information on terms of agreements,
- Payment Information (IBAN or account number, tax identification number, desired payment method, payment terms, deposit details),
- Electronic identification data such as the computer's IP address, browser type, browser version, service pages you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data,
- Customer history and ratings,
- Social media apps / websites / media data (cookies, username or name, photo, public information and comments when contacting us on social media, or through email attachments),
- The details mentioned in your CV or any attachments you send to us when a job vacancy is announced.

It is noted that we collect some more categories of personal data about our employees; they are informed through documents, manuals, policies and procedures and information internally provided.

## Purposes of Processing & the Legal Basis of Data Processing

The processing of personal data is based on one of the "legal bases" as referred to in Article 6 (or Article 9 in case of special categories of personal data). The legal bases on which the collection and processing of personal data is based are, in most of the cases: a) consent, b) compliance in performing our contractual obligations, c) compliance with our legal obligations and d) safeguarding our legitimate interests. For special categories of personal data, the a) explicit consent, and b) the performance of obligations and the exercise of specific rights of the controller or data subject in the field of labor law and social security / social protection law. The legal basis, on which the processing of your personal data is based, is as follows for each processing purpose:

- Consent: When you communicate with us in any way directly or indirectly as interested in our products and services, when you are interested in working with us, when informing you about our products and services in the context of our promotions, when you complain or when you evaluate us, when you visit our social media accounts, when you are connected to our wireless network, when you give us your business card, or when you're entering our premises in which we operate a CCTV system (operating in order to protect our assets and the people);
- Commitments to perform our contractual obligations;
- Compliance with our legal obligations: to comply with our legal obligations to all sorts of authorities such as police, labor law, regulatory, tax, accounting, auditors, judicial authorities and agencies;
- Keeping our Legal Interests: for the betterment of our services, for our payment, or for assessments of persons and situations.

Informing our employees about the legal processing of personal data we collect about them is carried out internally through documents and manuals.

## Retention of Data Period

We store personal data for as long as it is required by the respective processing purpose and any other permitted linked purpose.

Data collected on the basis of contractual and legal obligations shall be retained after the expiry of the contractual and legal obligations as provided by the relevant institutional framework.

CV's that are received electronically or manually, in periods where no post has been announced, are not kept and are immediately deleted or destroyed after notifying data subjects of their non-acceptance and destruction.

CVs obtained when a job has been announced are kept until the job is filled. They are then deleted and / or destroyed and for those that will be employed are transferred in their "employee record file".

Quotation data which does not lead to a cooperation agreement shall be kept for 1 month in hard copy and electronically until the end of the current year, taking into account that the one-month deadline for the quotation, expires.

Administrative records of standards we follow are kept for a period determined by the necessity of their probative value.

Web and application data are maintained for 30 days.

Wi-fi network access data is maintained for 90 days.

The video surveillance system data is kept for 15 days.

Data that may be needed for our legitimate interests as a Controller shall be kept until the reason for their compliance ceases.

Specifically, for the data we process based on your consent (e.g. for marketing purposes), these are kept from obtaining the consent until it is revoked.

Information that is no longer necessary is safely destroyed or anonymized. We limit access to your personal data to those who need to use it for the specific purpose.

## How we ensure the security of Personal Data

We have taken reasonable organizational and technical measures to protect the personal data we collect, and in particular any specific categories of personal data. We follow international standards and practices to ensure the security of our networks. We ensure you that your personal data is processed securely and legally, by adhering to policies and developing and implementing procedures. For example, the following security measures are used to protect personal data against unauthorised use or any other form of unauthorised processing:

- Our facilities are safe, taking reasonable measures.
- Access to personal data is restricted to a limited number of authorised employees under a need to know basis, and the necessary data transfer is done by secure procedures.
- Our employees are bound by confidentiality rules and agreements, with limited classified access to the necessary data only.
- In special categories of data, there is only authorised online access. In hard copy, they are locked in lockers where only authorised persons have access.

- We select trusted affiliates who are bound in writing, in accordance with Article 28 of the Regulation, with the same obligations regarding the protection of personal data. We reserve the right to control them in accordance with Article 28 (3) (h).
- In our ICT systems used for the processing of personal data, all technical measures are taken to prevent loss, unauthorised access or other illegal processing.

In addition, access to these ICT systems is monitored on a permanent basis in order to detect and prevent illegal use at an early stage. Although the transfer of data through the Internet or a web site cannot be guaranteed to be protected from cyberattacks, we work to maintain physical, electronic and procedural security measures to protect your data.

Some of the security measures we take are not announced for obvious reasons.

### **To whom the Data may be disclosed**

V.L Toolbox Express Computer Solutions Ltd takes every precaution to ensure that the recipients of personal data are kept to a minimum. The personal data we collect are disclosed to third parties, provided that the legality of such disclosure is fully justified.

Specific personal data from those we lawfully collect as a controller, may be accessed (or disclosed) on a case-by-case basis by:

- Any relative to data supervisory or prosecuting authority within its role.
- Any public or judicial authority where required by law or judicial decision.
- The auditor of the company, for necessary data according requirement (financial, personnel, contracts and other controls), under confidentiality.
- The legal advisor advocate of the company, for whatever data is required in legal cases, under confidentiality.
- Partner banks (of the company, the staff or affiliates and suppliers), only for payment related data.
- The training or systems consultants, the trainer and HRDA (training Authority) for training or systems control issues and only for the necessary pieces of information and data.

The personal data we collect is not transmitted by us to third countries or international organizations.

### **Territorial Scope**

The personal data we collect is processed within the European Economic Area (EEA).

### **Your rights as a Data Subject and how you can exercise them**

You have the right to be informed, the right of access to your personal data, the rights of rectification and erasure (in cases it is permitted), the right to restriction of processing, the right to data portability, the right to object. If processing is based on your consent you may withdraw it at any time.

The right to be informed is exercised through this privacy and personal data protection notification. In some cases it is also mentioned on documents – forms we are using.

We inform you that we are not using software of decision making solely based on automated processing including profiling.

1. **Right of access:** you have the right to obtain from us confirmation as to whether or not your personal data are being processed as well as other relevant information, and, where that is the case, access to your personal data.
2. **Right of rectification:** you have the right of rectification of your inaccurate personal data as well as to have incomplete personal data completed by providing a supplementary statement.

Note: Since it is not possible for us to be aware of any changes to your personal data if you do not inform us, please help us keep your information accurate by informing us of any changes to your personal information we do process.

3. **Right to erasure** ('right to be forgotten'): we have to answer such right when:
  - your personal data are no longer necessary in relation to the purposes for which we collected it
  - withdraw your consent on which the processing is based and where there is no other legal basis for the processing
  - your personal data have been unlawfully processed
  - personal data have to be erased for compliance with a legal obligation we are subject to
  - personal data have been collected in relation to the offer of information society services.

We reserve the right to refuse this right if the processing is necessary for compliance with any legal obligation, we are subject to, or for reasons of public interest, or for the foundation and exercise or support of our legal claims (according Article 17 § 3).

4. **Right to restriction of processing:** you have the right to restriction of processing when:
  - you contest the accuracy of your personal data for a period enabling us to verify the accuracy of the personal data
  - the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead
  - we no longer need your personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims
  - you objected to processing pending the verification whether our legitimate grounds override those of yours.
5. **Right to data portability:** You have the right to receive your data in a structured, commonly used and machine-readable format and under an explicit request such data to be transferred to both you and another natural or legal person who will process it.
6. **Right to object:** you have the right to object to the processing of your data at any time when the reason for the processing relates to direct marketing.

V.L Toolbox Express Computer Solutions Ltd, in the event that you make such request in a written or electronic form regarding any of the above rights, will assess your request and respond within one month of its receipt, either for its satisfaction or to provide you with objective reasons preventing it from being satisfied, or, given the complexity of the request and the number of requests at the given time, request an extension of response for a further two months period (Article 12.3).

The exercise of your rights is free of charge. Where requests from you are manifestly unfounded or excessive, in particular because of their repetitive character, we may refuse to answer or charge you an administrative fee.

If you are dissatisfied with the use of your data by us, or our response after exercising your rights, you have the right to lodge a complaint with a supervisory authority. Before such complaint, you may contact us if you wish so we can provide you with complete information and support.

## **Personal Data Breach**

In the event of a breach of the security and integrity of the personal data processed, we will take the following measures (in accordance with Article 33 and 34 of the Regulation) and we will:

- assess it in order to implement the appropriate procedures needed to limit the breach
- examine the extent of the breach and the sensitivity of the data included
- evaluate the risk and its impact on your rights and freedoms
- endeavour to reduce as much as possible the damage that is or may be caused
- notify within a time limit of 72 hours of becoming aware of the breach, the National Personal Data Protection Authority, if required
- assess the impact on your privacy and take appropriate measures to prevent the repeating of the incident

In the event we are the processor, we will inform the Controller as soon as possible.

## **Links to other Websites**

Our Website may contain links to other websites that are not operated or controlled by us. If you click on a third-party link, you will be directed to that third-party site. We recommend that you review the Privacy Policy for each site you visit. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

## **Cookies Policy**

We use cookies and similar tracking technologies to track activity in our Service and to maintain certain information.

Cookies are files with a small amount of data that may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other monitoring technologies also used are beacons, tags and scripts to collect and monitor information and improve and analyse our Service.

You can instruct your browser to reject all cookies or indicate when a cookie will be sent. However, if you do not accept cookies, you may not be able to use some of our services.

Examples of cookies we use:

- Session cookies. We use session cookies to operate our service.



- Cookies of preferences. We use preference cookies to remember your preferences and different settings.
- Security cookies. We use security cookies for security reasons.

## **Analytics**

We may use third party service providers to monitor and analyse the use of our Service.

## **Google Analytics**

Google Analytics is a web analytics service offered by Google that monitors and reports site traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the data collected to contextualize and personalize its own ad network ads. You can opt out of making your business available in Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visit activity. For more information on Google's privacy practices, please visit the Google Privacy Policy web site: <http://www.google.com/intl/en/policies/privacy/>

## **Data Usage**

V.L Toolbox Express Computer Solutions Ltd uses the collected data for a variety of purposes such as:

- To provide and maintain our service
- Notify you of changes to our Service
- To be able to participate in interactive features of our Service when you choose
- Provide Customer Support · Collect analytics or valuable information to improve our Service
- Monitoring the use of our Service · to detect, prevent and troubleshoot technical issues

## **Contact Information for the Privacy Authority**

Cyprus Personal Data Protection Authority, 1 Iasonos Street, 1082 Nicosia, telephone +357.22818456,

e-mail: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy).

Additional information and terminology for the Rules of Procedure can be found at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679>.

**Contact Information for Personal Data Issues**

Appointment of Data Protection Officer (DPO): In accordance with the provisions of GDPR Regulation (2016/679, Section 37), we inform you that Data Protection Officer (DPO) of V.L. Toolbox Express Computer Solutions Ltd is Elena Stavrou. If at any time you believe that VL Toolbox Express Computer Solutions Ltd is not following or complying with the provisions set out in this policy or any other matter relating to the protection of personal data, please contact the data protection officer by:

Email: [dpo@vltoolbox.com.cy](mailto:dpo@vltoolbox.com.cy) Phone: 24828668 Fax: 24828667

**Policy Update**

This policy is effective from May 25, 2018 and will be reviewed when there is a significant change. This review will be available on our website, with a note of the effective date. You may find a hard copy of this policy at our offices or may be dispatched at your request.