

PRIVACY POLICY

PRIVACY POLICY FOR LIMASSOL AGORA

Privacy Policy

Last updated: April 15, 2024

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy.

DEFINITIONS

Limassol AGORA (referred to as ‘we’, ‘us’, ‘our’, ‘AGORA’ or the ‘Company’) is committed to protecting your privacy and handling your data in an open and transparent manner.

Personal Data (or Data) any information that directly, indirectly, or in connection with other information — including personal identification number, name, address.

Consent shall mean any freely given, specific, informed and unambiguous indication of the Data Subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the Processing of Personal Data relating to him or her.

Processing may include collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

User shall mean the individual using this Website who, unless otherwise specified, coincides with the Data Subject.

Data Subject the natural person to whom the Personal Data refers. (referred to a “you” “yours” or the “Data Subject”)

Data Processor (or Data Supervisor) The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner) 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, including the security measures concerning the operation and use of this website. The Data Controller, unless otherwise specified, is the Owner of this Website.

Service The service provided by the Company as described in the relative terms (if available) and on this site. Service also refers to this Website.

Usage Data Information collected automatically through this website which can include: the IP addresses or domain names of the computers utilized by the Users who use this website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Website) and the details about the path followed within the Website with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

Website <https://www.limassolagora.com/>

European Union (or EU) unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookies Small sets of data stored in the User's device.

Legal information this privacy statement has been prepared based on provisions of multiple legislations, including Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to this Website, if not stated otherwise within this document.

Owner Contact email: adminiastration@limassolagora.com

Phone number: 700 700 70

WHAT INFORMATION DO WE COLLECT AND HOW DO WE USE IT?

Among the types of Personal Data that this Website collects, by itself or through third parties, including first name; last name; phone number; email address.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Website.

Unless specified otherwise, all Data requested by this Website is mandatory and failure to provide this Data may make it impossible for this Website to provide its services. In cases where this Website specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by this Website or by the owners of third-party services used by this Website serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through this Website and confirm that they have the third party's consent to provide the Data to the Owner.

WHY WE PROCESS YOUR PERSONAL DATA

The Data concerning the User is collected to allow the Owner to provide its Services, as well as for the following purposes: Analytics, SPAM protection and Contacting the User.

Users can find further detailed information about such purposes of processing and about the specific Personal Data used for each purpose in the respective sections of this document.

DETAILED INFORMATION ON THE PROCESSING OF PERSONAL DATA

Personal Data is collected for the following purposes and using the following services:

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics (Google LLC)

Google Analytics is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookies; Usage Data.

SPAM protection

This type of service analyzes the traffic of this Website, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

- Google reCAPTCHA (Google LLC)
- Google reCAPTCHA is a SPAM protection service provided by Google LLC.
- The use of reCAPTCHA is subject to the Google privacy policy and terms of use.
- Personal Data collected: Cookies; Usage Data.

LEGAL BASIS

A. For the performance of a contract

We process personal data in order to provide services based on contracts with our customer but also to be able to complete our acceptance procedure so as to enter into a contract with prospective customers.

B. For compliance with a legal obligation

There are various supervisory authorities whose laws and regulations we may be subject, such obligations and requirements impose on us necessary personal data processing activities for identity verification, compliance with court orders, or other reporting obligations and controls.

C. For the purposes of safeguarding legitimate interests

We process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. Examples of such processing activities include:

- Initiating legal claims and preparing our defence in litigation procedures,
- Measures to manage business and for further developing products and services.

Provided that you have given us your specific consent for processing then the lawfulness of such processing is based on that consent. You have the right to revoke consent at any time. However, any processing of personal data prior to the receipt of your revocation will not be affected.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

CHILDRENS' PRIVACY

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

LINKS TO OTHER WEBSITES

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every 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.

INFORMATION FROM THIRD-PARTY SOCIAL MEDIA SERVICES

The Company allows You to create an account and log in to use the Service through the following Third-party Social Media Services:

- Google
- Facebook

- Twitter
- Instagram

If You decide to register through or otherwise grant us access to a Third-Party Social Media Service, We may collect Personal data that is already associated with Your Third-Party Social Media Service's account, such as Your name, Your email address, Your activities or Your contact list associated with that account.

You may also have the option of sharing additional information with the Company through Your Third-Party Social Media Service's account. If You choose to provide such information and Personal Data, during registration or otherwise, You are giving the Company permission to use, share, and store it in a manner consistent with this Privacy Policy.

METHODS OF PROCESSING

The Owner strives to use commercially acceptable means and measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Website (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested by the User at any time.

WHO RECEIVES YOUR PERSONAL DATA?

In the course of the performance of our contractual and statutory obligations your personal data may be provided to various departments within the Company. Various service providers and suppliers may also receive your personal data so that we may perform our obligations. Such service providers and suppliers enter into contractual agreements with the Company by which they observe confidentiality and data protection according to the data protection law and GDPR. The Company may disclose your information where required to do so by law, if subject to subpoena or other legal proceeding or if you have given your consent. All data processors appointed by us to process personal data on our behalf are bound by contract to comply with the GDPR provisions.

Under the circumstances referred to above, recipients of personal data may be, for example:

- External legal consultants
- Financial and business advisors
- Auditors and accountants
- Marketing companies and market research companies
- Card Payment processing companies

HOW LONG WE KEEP YOUR PERSONAL INFORMATION FOR

AGORA will retain personal data it processes on behalf of you for as long as needed to provide its services. AGORA will retain this personal information as necessary to comply with its legal obligations, resolve disputes and enforce its agreements.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

AUTOMATED DECISION MAKING

Automated decision-making means that a decision which is likely to have legal effects or similarly significant effects on the User, is taken solely by technological means, without any human intervention. This Website may use the User's Personal Data to make decisions entirely or partially based on automated processes according to the purposes outlined in this document. This Website adopts automated decision-making processes as far as necessary to enter into or perform a contract between User and Owner, or on the basis of the User's explicit consent, where such consent is required by the law.

Automated decisions are made by technological means – mostly based on algorithms subject to predefined criteria – which may also be provided by third parties.

The rationale behind the automated decision making is:

- to enable or otherwise improve the decision-making process;
- to grant Users fair and unbiased treatment based on consistent and uniform criteria;
- to reduce the potential harm derived from human error, personal bias and the like which may potentially lead to discrimination or imbalance in the treatment of individuals etc.;
- to reduce the risk of User's failure to meet their obligation under a contract. To find out more about the purposes, the third-party services, if any, and any specific rationale for automated decisions used within this Website, Users can check the relevant sections in this document.

Consequences of automated decision-making processes for Users and rights of Users subjected to it

As a consequence, Users subject to such processing, are entitled to exercise specific rights aimed at preventing or otherwise limiting the potential effects of the automated decisions taken.

In particular, Users have the right to:

- obtain an explanation about any decision taken as a result of automated decision-making and express their point of view regarding this decision;
- challenge a decision by asking the Owner to reconsider it or take a new decision on a different basis;
- request and obtain from the Owner human intervention on such processing. To learn more about the User's rights and the means to exercise them, the User is invited to consult the section of this document relating to the rights of the User.

USER'S DATA PROTECTION RIGHTS

You have the following rights in terms of your personal data we hold about you.

(a) The right to access

You have the right to confirmation as to whether or not AGORA process your personal data and, where AGORA does, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, AGORA will supply to you a copy of your personal data.

(b) The right to rectification

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

(c) The right to erasure

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

(d) The right to object to processing

Where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. If you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms. You also have the right to object where we are processing your personal data, for direct marketing purposes. This also includes profiling in as much is related to direct marketing.

If you object to processing for direct marketing purposes, then we shall stop the processing of your personal data for such purposes.

(e) The right to restrict processing

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; AGORA no longer needs the personal data for the purposes of AGORA processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, AGORA may continue to store your personal data. However, AGORA will only otherwise process it: with your consent; for the establishment,

exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

(f) The right to data portability

You have the right to request to receive a copy of your personal data in a format that is structured and commonly used and transmit such data to other organisations. You also have the right to have your personal data transmitted directly by AGORA to other organisations you will name.

(g) The right to complain to a supervisory authority

If you have exercised any or all of your data protection rights and still feel that its concerns about how the Company uses your personal data have not been adequately addressed by the Company, you have the right to complain.

(h) The right to withdraw consent.

You have the right to withdraw the consent that you have given to the Company with regard to the processing of your personal data at any time. Note that any withdrawal of consent shall not affect the lawfulness of processing based on consent before it was withdrawn or revoked by you.

We endeavour to address all of your requests promptly.

Users must know that, however, their Personal Data should be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

HOW TO EXERCISE THESE RIGHTS

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

ADDITIONAL INFORMATION ABOUT DATA COLLECTION AND PROCESSING

System logs and maintenance

For operation and maintenance purposes, this Website and any third-party services may collect files that record interaction with this Website (System logs) use other Personal Data (such as the IP Address) for this purpose.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page and possibly within this Website and/or – as far as technically and legally feasible sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

COOKIES

Stored cookies allow AGORA Website to be more user-friendly and efficient for Users by allowing the AGORA to learn what information is more valued by Users versus what isn't.

Cookies can be stored on your device if they are strictly necessary for the operation of this site. For all other types of cookies, we need your permission.

This site uses different types of cookies. Some cookies are placed by third party services that appear on our pages.