



Privacy Policy

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1. Introduction

Your personal data privacy and trust are of crucial importance to us and the success of our business. We collect information about our clients and website visitors and here we will outline the type of information we gather, the reasons we do so and what we do with it. You'll also be able to see how you can modify any information you entrust to us.

Our data collection policies allow you to choose how much information to provide us and to control how we use whatever information you tell us. Our goal is to provide you with a robust experience while allowing you to control your privacy and giving you a means to voice any questions or concerns you may have.

Meldafern Limited, hereafter **Meldafern**, registered in the Republic of Cyprus with registration number HE 399628, Address: 1st Floor, 81-83, Griva Digenis Avenue, 1090 Nicosia, Cyprus, is a personal data controller following the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 – General Data Protection Regulation (GDPR).

2. How you can contact Meldafern?

If you have any questions about your privacy rights, you can contact with **Meldafern**, in the following ways:

- By email at: info@meldafern.com
- By contacting us on the following phone: +357 22 278 342
- By contacting us on our web site <https://meldafern.com/>, section “Contact Meldafern”

3. Collection of Your Personal Information

The personal information that we may collect about you broadly falls into the following categories:

- Personal information (name, job title)
- Contact information (e-mail address, phone numbers)
- Demographic information (post code, zip code, preferences and interests)

We may also collect non-personal information about you which is collected anonymously through third-party cookies, web beacons, and other similar methods. We may collect the following non-personal information:

- Hardware or software information (browser type, geographic location, IP address, etc.)
- Analytics information (time spent on this website, number of pages viewed, etc.)
- Information collected through the use of technology (cookies, web beacons, etc.)

4. How and why, we use your personal data?

We collect and process personal data only subject to the requirements of local and European legislation. We understand that processing your personal data is for a specific reason and cannot be done without limitation.

We gather and process your personal data for a variety of reasons and rely on a number of different legal bases to use that information, for example, we use your personal data information to provide you with advice and services, to ensure we provide you with the best service possible, to prevent unauthorised access to your personal data and to meet our legal and regulatory obligations.

This Privacy policy is intended to explain to you how and why we process your personal data.

4.1. *For fulfilment of a contract or in the context of pre-contractual relations (To enter into and perform a contract for a service).*

The purpose for collecting information is:

- Identification of a client or counterparty upon: concluding a new or changing an existing contract with us, in order to fulfil a contract;

- Making proposals for signing contracts;
- Data we receive when performing obligations arising from contracts entered by you;
- Administration and response to customer complaints/inquiries/;
- Payment management;

4.2. To comply with legal obligations.

We are required to process your personal information in order to comply with certain statutory obligations, for example:

- providing information to the relative Commission for The Protection of Personal Data in relation to obligations under the legislation on the protection of personal data - Personal Data Protection Act, Regulation (EC) 2016/679 of 27 April 2016, etc.;
- providing information to the court and third parties in the course of proceedings before a court, in accordance with the requirements of procedural and substantive legal acts applicable to the proceedings;
- obligations stipulated in the Accountancy and the Tax and Social Insurance legislation and other related legal acts in relation to the keeping of correct and lawful accounting;

5. How We Share the Information Collected

Meldafern sometimes shares your personal data with trusted third parties who perform important functions for us based on our instructions and applying appropriate confidentiality and security measures. For example, we use third-party service providers for security or technical issues.

If we are required by law, or if this is necessary to protect our legitimate interests, we may also disclose certain personal data to public authorities.

We guarantee that access to your data by third-party private legal entities takes place in accordance with the legal provisions in the field of data protection and information confidentiality, based on contracts concluded with them.

We do not transfer data outside of the European Union or EEA.

6. Email Policy

We do not allow any third-party company to use your email address for commercial purposes without your expressed permission.

7. Your Rights:

In relation to the processing of personal data, you have the following rights that you may exercise at any time while we store or process your personal data by submitting an application to the address of the **Meldafern** referred to above, electronically via email: info@meldafern.com, or using our website the Section 'Contact Meldafern'.

Rights of the data subject:

Right of confirmation

Each data subject shall have the right to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact any employee of the controller.

Right of access

You can access the personal data we hold about you by contacting us with a data access request, using our contacts forms.

Correct/ restrict /delete your personal data

If you believe that certain personal data, we hold about you is inaccurate or out of date, you can request that the data to be corrected at any time. For each request for changing of personal data, including e-mail

and address, we require you to provide the respective documents, proving the validity of the change. If you dispute the accuracy of information held, you can request that we restrict the processing of this information while your complaint is being examined.

If you suspect that we are processing certain information without a legitimate reason, or that we are no longer entitled to use your personal data, you can also ask for that personal data to be deleted.

We are not under obligation to delete your personal data where to do so would prevent us from meeting our contractual obligations to you, or where Meldafern is required or permitted to process your personal information for legal purposes or otherwise in accordance with our legal obligations.

Right to data portability

Each data subject shall have the right to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format.

Object to your personal data being used for certain purposes

If you disagree with the way in which we process certain data, you can object to this through one of the channels identified in the Section 'How you can contact Meldafern' from above. In such cases, we will provide you with details regarding the rationale for processing your personal data.

Automated individual decision-making, including profiling

Each data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision:

- is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or
- is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or
- is not based on the data subject's explicit consent.

Right to withdraw data protection consent

Each data subject shall have the right to withdraw his or her consent to processing of his or her personal data at any time.

Right to complain

If you believe that we are breaching the applicable legislation, please contact us to clarify the issue. Of course, you have the right to file a complaint with the **Office of the Commissioner for Personal Data Protection**. Find out on their website how to submit a complaint (<http://www.dataprotection.gov.cy>).

8. Security and Confidentiality

We use a variety of security technologies and procedures to protect your personal data from unauthorised access, use or disclosure. We also take steps to ensure that only persons with appropriate authorisation can access your personal data.

We have in place systems and procedures to prevent improper modification or disclosure, misuse and loss of information.

Only staff members who are suitably authorised can access your personal data if that data is relevant to the performance of their duties.

We use internal technical and organisational measures to protect your personal data from unauthorised access, to maintain data accuracy and to help ensure the appropriate use of your personal data.

We will not sell or hire your personal information to third parties for their own use.

9. Cookie Policy

This website uses Cookie. To learn more, you may consult the Cookie Policy.

10. Other Sites

Our website may include links to other websites and once you have used these links to leave our site we encourage you to carefully read their privacy policies also. We cannot be responsible for the protection of any information which you provide whilst visiting such sites. This privacy policy applies only to information collected by our website.

11. Period for which the personal data will be stored

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfilment of the contract or the initiation of a contract. In the event, in the process of our negotiations, we do not reach an agreement, we will not store the data received from you.

12. Changes to This Policy

In order to apply the most up-to-date data protection measures and to comply with the current legislation, we will keep under regular review this Privacy Policy. If the amendments we make are substantial, we can post a message about the changes on our website.

We invite you to review the current version of this Privacy Policy, to be constantly informed about how we take care of the protection of the personal data we collect.