

Privacy Notice

Last Updated: 01.02.2024

Introduction

Our Company offers a wide range of services specified in the Terms of Use. These services are collectively referred to as "Services".

Before using our Services, it's important to carefully read and understand this Privacy Policy. This Privacy Policy provides details about the information collected by our company when you use the Services, how this information is utilized, who it may be shared with, and the rights you have.

By using this website, you agree to the terms of this Privacy Policy. If you do not agree with the terms outlined in this Privacy Policy, we kindly request that you refrain from providing your data.

Periodically, we may update our Privacy Policy, and we retain the right, at our sole discretion, to enact modifications at any point without prior notification. Such revisions to the Privacy Policy come into effect as soon as they are posted on our website. By using our services after the updated Privacy Policy, you indicate your acceptance of the aforementioned changes.

Unless explicitly stated otherwise, the terminology used within this document holds the same meanings as defined in the Terms of Use.

1. Who we are, and what is our role with respect to your Personal Data?

In this Privacy Notice, any reference to "Spex Marketing Agency", "we", "us" and "our" means SPEX MARKETING AGENCY LIMITED, a limited liability company incorporated under the laws of Cyprus.

Registration number: HE 455205

Address: Georgiou Gennadiou, 10 Agathangelos Court, Flat/Office 203, 3041, Limassol, Cyprus

For personal data collected when you access and use the Website or communication channels via Social Media (as Twitter, LinkedIn, or Facebook), we may act as a data controller, joint data controller, or a data processor depending on applicable circumstances as described below.

A data controller is an entity or individual that determines the purposes and means of processing personal data. In other words, the data controller is responsible for deciding why and how personal data is collected, stored, used, and disclosed. The Data controller is also obligated to ensure that the processing of personal data complies with the principles and requirements of the applicable legislation, including obtaining the necessary consent from data subjects and protecting their rights in relation to their personal data.

A joint data controller refers to two or more entities or organizations that jointly determine the purposes and means of processing personal data. In this scenario, they share the responsibility for complying with data protection laws and ensuring the protection of individuals' rights whose personal data is being processed. According to the applicable data protection legislation, which includes the Personal Data Protection Act 2012, and we make efforts to comply with the best practices of personal data protection introduced by the GDPR (collectively hereinafter referred to as the "Applicable Legislation"), we may be regarded as joint controllers, for example, in the following case: with respect to your Social Media Data (what is this data outlined below) — when you contact us via Social Media, we are deemed a data controller with respect to (i) the data you provide us with and (ii) the statistical data provided by the respective Social Media. However, with respect to any other processing of your data, the respective Social Media acts as an independent data controller.

A data processor is an entity or organization that processes personal data on behalf of a Data controller. The Data processor's role is to process Personal data according to the instructions provided by the Data controller. They may include various tasks such as collecting, storing, organizing, analyzing, and deleting Personal data.

2. The term "Personal Data" or "Personal Information"?

2.1. "Personal Information" or "Personal data" means any information relating to an identified or identifiable natural person;

2.2. "Sensitive personal information" as personal information that reveals (a) consumer's Social Security or other state identification number; (b) a consumer's account log-in, financial

account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; (c) consumer's geolocation; (d) consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership; (e) the contents of a consumer's mail, email, or text messages, unless the business is the intended recipient of the communication; and (f) consumer's genetic data. Biometric information for purposes of identifying a consumer; personal information collected and analyzed concerning a consumer's health, and personal information collected and analyzed concerning a consumer's sex life or sexual orientation also included in the list of "Sensitive personal information"

3. Personal data that is collected

The categories of personal data we collect depend on how you interact with us, use the Website, and the requirements of the Applicable Legislation.

Category of Data	Examples	Description or Comments
Analytical and Statistical Data	Internet protocol (IP) address	<p>When you access and use the Website, certain data may be collected automatically via Google Analytics. More information regarding Google Analytics is available here.</p> <p>After collecting the personal data, Google creates reports about the use of the Platform, which contain aggregated information where we do not see any data pertaining to a particular person. In other words, we cannot identify you from the other users.</p> <p>Besides, we gather the information by means of placing cookies. Cookies are a feature of the software that allows web servers to recognize the device used to access the Website. A cookie is a small text file that the Website saves on your device when you visit thereof. They allow the Website to remember your actions and preferences over a period of time.</p>
	the type of device used	
	the browser used	
	the device operating system	
	information regarding your use of the Website, for instance, when you clicked a certain button or made some input.	
Contact Data	name/nickname	<p>This data is collected through a contact form on the website.</p> <p>You decide at your own discretion what data to provide to us.</p>
	email address	
	phone number	
	any other data requested by us or data that you choose to provide us with	
Subscription Data	email address	If you contact us via the contact form on the website, we may use the indicated email for our marketing and newsletter purposes.
Social Media Data	nicknames, names, and/or photos	You may contact us via Social Media such as Twitter, LinkedIn, or Facebook.
	messages, comments, and other communications	In general, Social Media makes available the respective statistical information to us in an

	information provided to us by the respective Social Media as outlined below	<p>anonymized form. It is impossible for us to make any conclusions about individual users and access to individual user profiles relying solely on such information.</p> <p>Certain categories of personal data and processing details vary depending on the Social Media, therefore, please refer to the respective Social Media listed below.</p> <ul style="list-style-type: none"> - Twitter - LinkedIn - Facebook
	other data that you choose to provide us with	
Contract Data	full name	<p>If you want us to enter into a contract to provide you with services, you will need to provide some Personal data about yourself. If you are acting independently, this includes, at least, your full name, passport details, and channels of communication. If you are acting on behalf of a company, you will also need to indicate your position in such a company (for example, managing director, etc.).</p> <p>Please note that the email info@company.net is not personal data.</p>
	contact details	
	position in company	
	passport data	
	other data that are required by applicable legislation for the establishment of a contractual relationship or agreement between us	
Feedback Data	name	<p>If you are satisfied with the services, or for other reasons decide to tell others your impression of us, you can send us feedback and we will publish it on our Website.</p>
	position	
	photo	

4. Legal purpose to use your personal information

4.1. We collect, process and disclose personal information for purposes including the following:

- to provide services to you;
- to register your account;
- to develop our services;
- to conclude agreements with you;
- to perform our obligations to you under the Terms of Use, and to ensure that you perform your obligations under Terms of Use;
- to communicate with you;
- in promotional purpose;
- to establish your bona fides;
- to comply with our legal and statutory obligations,
- to provide support to you;
- to resolve your questions;
- to protect your data;
- to provide services updates and product announcements from third parties;
- to manage our operation;
- to manage risks;
- etc

5. To whom Personal Information is disclosed?

We share personal information with other entities in a strictly controlled manner. We prohibit third parties who purchase the Personal Information we hold from reselling it unless you have an opportunity to opt out of the sale of your information.

We may disclose your personal information to third parties as follows:

- to our contractors and external service providers associated with the operation of our business and provision of our services including, without limitation, associated data centres, web hosting providers, identification verification service providers, advertising agencies, mailing houses, printers, call centers, market research analysts, IT consultants, professional advisors and other consultants;
- to law enforcement agencies to assist in the prevention of criminal activities;
- to government and regulatory authorities and other organizations as required or authorized by law or otherwise;
- controlling bodies where such controlling bodies request information to protect and maintain the integrity of services provided; and
- to a successor entity in the event of a business transition, such as a merger, corporate reorganization or to a purchaser of part of or all of our assets.
- other third parties for whom we have obtained your permission to disclose your Personal Information.

If the information needs to be transferred to a third party, we will take appropriate steps to ensure that the disclosed information is safeguarded by the third party through contractual agreements.

6. Your rights

6.1. Your Rights Regarding Personal Information:

- **Right to Information Access:** You have the right to request that we disclose to you: (1) the categories and/or specific pieces of personal information collected about you, (2) the categories of sources from which the personal information was obtained, (3) the purposes for which we use the information, (4) the categories of third parties with whom we share the information, and (5) the categories of information that we sell or disclose to third parties. You can submit such a request up to two times per year, at no cost to you.
- **Right to Deletion:** You are entitled to request that we delete the personal information collected from you and instruct our service providers to do the same, subject to specific

exceptions (such as situations where legal obligations require us to retain the information).

- Right to Opt-Out of Sale or Sharing: You have the option to request that we cease selling or sharing your personal information ("opt-out"), including through a user-enabled global privacy control. We are prohibited from selling or sharing your personal information after receiving your opt-out request unless you subsequently provide authorization for us to do so.
- Right to Correction: You may ask us to rectify any inaccurate information that we possess about you.
- Right to Restrict Sensitive Information Use and Disclosure: You can instruct us to restrict the usage of your sensitive personal information (such as your social security number, financial account data, precise geolocation, or genetic data) to specific purposes, such as providing you with the requested services.

7. How long do we retain your personal data?

Generally, personal data is retained for the period necessary to provide the requested services, to comply with legal, accounting or reporting provisions, and to facilitate reasonable access to your personal data.

Your information will be deleted, anonymized, or pseudonymized as soon as it is no longer necessary to meet our business needs, comply with legal obligations, resolve disputes, protect our assets or comply with our contractual obligations.

8. How do we protect your information?

We will handle all personal data with the utmost care to guarantee its security, integrity, and confidentiality. This involves safeguarding against unauthorized or unlawful processing, as well as accidental loss, destruction, or harm. We will employ suitable technical and organizational measures, such as encryption protocols, pseudonymization/anonymization (where relevant), access controls, authentication procedures, and physical, operational, and information security protocols.

9. Questions or Concerns Regarding the Privacy Policy

If you have questions or concerns regarding privacy using our Service, please contact us at: info@spex-marketing-agency-ltd.com

10. Cookies

What are Cookies?

Cookies are small text files that are downloaded on your device (e.g. a computer or smartphone) when you access the Website. Cookies support the operation of our website as well as allow the Website to recognize your device and store some information about your preferences or past actions. Below we explain the cookies we use and why.

Why do we use Cookies?

Cookies aim to make a website more efficient for users. They allow personalized web pages to be offered to provide a more convenient and faster visit experience tailored to your needs. These files store information about your website navigation. When you use the website again, your devices will remember your data thanks to the information kept in the file.

How Do We Use Cookies?

The cookies that we use are as follows:

- *Strictly necessary cookies*

These cookies are essential to enable you to move around our website and use its features, such as accessing secure areas of the website.

- *Functionality cookies*

These are cookies that allow our website to remember choices you make (such as your user name, language or the region you are in) and to provide enhanced, more personal features. These cookies can remember changes you have made to text size, fonts and other parts of web pages you can customise. They may also be used to provide services you have asked for.

- *Performance cookies*

These cookies collect information about how you use our websites, for example, which pages you go to most often and if you get an error message. These cookies are used to improve how our website works.

Managing and Disabling Cookies

You can change your cookie settings at any time by using Cookie Settings button on the Website. You can then adjust the available sliders to 'On' or 'Off', then clicking 'Save and close'. You may need to refresh your page for your settings to take effect.

Alternatively, most web browsers allow some control of most cookies through the browser settings. You can manage cookie settings in this way at any time.

Please keep in mind that simply disabling all cookies or all of our cookies in your browser settings may lead to certain sections or features of our Website not working. Therefore, we recommend using the Cookie Settings button on our Website instead of disabling all cookies in your web browser.

- For the Chrome web browser, please visit this page from Google:
<https://support.google.com/accounts/answer/32050>
- For the Internet Explorer web browser, please visit this page from Microsoft:
<http://support.microsoft.com/kb/278835>
- For the Firefox web browser, please visit this page from Mozilla:
<https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>
- For the Safari web browser, please visit this page from Apple:
https://support.apple.com/kb/PH21411?locale=en_US
- For any other web browser, please visit your web browser's official web pages

What are the consequences of disabling cookies?

Cookies that are essential to the function of the website will still apply to you;

You will still see advertising, but it may not be targeted and may not be relevant to you; and

We will still share your personal data with our service providers suppliers to provide the services on our website.

Please note if you are a user your opt-out choice will only be effective for this browser. If you clear your cookies on this browser, you will need to opt-out again.

How to contact us?

If you have any questions about these **Cookies**, please contact us via: info@spex-marketing-agency-ltd.com