

Privacy Notice (according to Article 13)



This Privacy Notice aims to inform and assure you that M.C.S Quality IP Limited (hereby refer to as “**Company**” or “**we**”) handles your personal information with respect to your personality and your rights and in accordance with Regulation (2016/679 (EU) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “**Regulation**”).

This Notice addresses all natural persons which wish to contract with us or to establish a business relationship, clients of the Company, directors, shareholders, secretaries of legal entities, authorized signatories, management committee and/or members of another legal entity and/or natural persons who have a business relationship with the company.

“**Personal data**” means any information about you, that could identify you directly or indirectly, such as your name, ID number, phone number.

“**Processing**” means any operation or set of operations which is performed on personal data, by automated means or otherwise, including collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

We ask you to read this Privacy Notice carefully as it contains important information on who we are, how and why we collect, store, use and share your personal information, your rights in relation to your personal information and on how to contact us and the supervisory authorities in the event that you have a complaint.

<p>1. Who we are</p>	<p>Controller:</p> <p>M.C.S Quality IP Limited Registration No.: HE365864 Address: Constantinou Paleologou 41, 6036 Larnaca, Cyprus Phone Number: 24 821856 Fax Number: 24 662922 E-Mail Address: dpTEAM@qualitydevelopments.com</p> <p>Data Protection Officer (DPO):</p> <p>Harris Kyriakides LLC 115 Faneromenis Avenue, Antouanettas Building 6031 Larnaca Tel.: 24 201600 Fax: 24201601 Email: dpTEAM@qualitydevelopments.com</p>
<p>2. Our sources of collecting personal data and the personal data we process.</p>	<p>We process personal data that you provide to us in the course of our services as Property Development Organisation. For this purpose, we process and collect personal data that we receive from other affiliated with Quality Group, such as, the companies included in Quality Group or third parties, such as agencies. We may also collect and process personal data from databases and/or sources that are publicly accessible, such as the Land Registry, the Registrar of Companies and the Official Receiver, the press and the Media and companies that introduce you</p>

	<p>to us. We process data that we collect lawfully and that we are permitted to process.</p> <p><i>Information we collect</i></p> <p>The personal data we collect from our clients or prospective clients mainly include the following: Name, Surname, Date, City and Country of Birth, Identity/Passport Number, address (including proof of address, such as utility bill), Contact Details, such as Phone number and Email address, Bank account details, income, source of income, proof of funds, bank reference, shareholders statement, information about your marital status (including marriage certificate), information about your kids (including their birth certificates), your family tree, criminal record, CV, profession, your nationality and country of residence.</p> <p>Please note that the data we collect vary among the different services we provide, such as applications for citizenship, after-sale services, taxation, insurances, rent services.</p>
<p>3. The purpose for processing your personal data and the legal ground of this processing.</p>	<p>We collect and process personal data in full compliance with the provisions of the Regulation as well as the national legislation.</p> <p>In the paragraph below (3.1 to 3.4) there is a more detailed analysis of the purposes and the legal ground of the processing.</p>
<p>3.1 For the performance of a contract (Article 6 (1) (b))</p>	<p>The processing of personal data is necessary in order for us to be able to provide our services to you in accordance with our contract and/or to fulfill your orders and/or to provide you with related services. Moreover, we might need to process your personal data when examining your application or during the negotiations before signing a contract.</p> <p>The purposes of the processing are adjusted according to the nature of the service provided, such as a purchase of a property, research at the Department of Lands and Surveys.</p>
<p>3.2 For the purposes of the legitimate interests pursued by us or by a third party (Article 6 (1) (f))</p>	<p>Except for the above case, either we or third parties, process your personal data when necessary, except if your fundamental rights and freedoms override the above interests. Below are some examples:</p> <ul style="list-style-type: none"> (A) in the public and/or market research in general, if you have not exercised the right to object. (B) in court proceedings and/or to claim our legal claims. (C) in the context of the operation and security of the IT sector of the company. (D) in the context of preventing and clarifying criminal offenses. (E) for the purpose of improving our services and products. <p>It is noted that the CCTV system established in our premises aims at providing a safe and secure environment for our employees and clients and the smooth operation of our company.</p>

<p>3.3 Due to your consent (Article 6 (1) (a))</p>	<p>If you give your consent on the processing of your personal data for specific purposes, such as for direct marketing purposes, the legal ground for the processing of your personal data is your express consent.</p> <p>Please note that you may at any time withdraw your consent. The validity of this revocation will concern the future. Furthermore, it should be noted that the above also applies if you gave us your consent before 25 May 2018.</p>
<p>3.4 For compliance with a legal obligation (Article 6 (1) (e))</p>	<p>The Company is subject to various legal obligations, such as the obligations arising from the Prevention and suppression of money Laundering and terrorist financing Law of 2007 (Law 188(I)/2007), the Income Tax Law 2002 (Law 118(I)/2002) and the tax legislation in general.</p> <p>The legal obligations vary according to the services we provide to you or your status.</p>
<p>4. Who we share your data with</p>	<p><i>Within the Company</i></p> <p>In the course of the Company’s operation, the relevant employees responsible for the performance of our contractual and legal obligations receive the necessary data.</p> <p>Moreover, we might share your personal data within the Quality group of Companies, if this is necessary for the performance of our obligations or to fulfill your orders.</p> <p><i>Outside the Company</i></p> <p>Under Article 28 of the Regulation, we have the right to designate a processor. In such a case, it is likely that the processor will receive your personal data for the above purposes. For example, we might designate as processors IT companies and Cloud Providers (such as Toolbox or CRM companies), consultancy companies such as accountants or law firms, as well as marketing companies, companies providing organizing and filing services or register agents.</p> <p>Furthermore, the company is legally obliged to transfer your personal data to various government authorities and/or services, as for example: District Office, Tax Office and VAT Services, Department of Lands and Surveys, auditors, Registrar of Companies, Town Hall or City Hall, Department of Civil Registry and Migration, Electricity Authority of Cyprus, Water Board of Larnaca, CYTA or Banks.</p> <p>It is possible for us to share your personal data to other people/companies/organisations if you have given us your express consent for such transfer.</p>
<p>5. How long your personal data will be kept for</p>	<p>For existing clients</p> <p>We will hold your personal data during our contractual relationship, including the pre-contractual negotiations stage. After the termination of our contractual relationship, we hold your personal data for up to 15 years, or the period required by the applicable Taxation law, or according to the relevant directive of the Commissioner of Personal Data.</p> <p>For potential clients</p> <p>We will hold your Personal Data during our negotiations prior to the conclusion of the contract, to the extent that it is necessary. In case of rejection of your</p>

	<p>application or withdrawal of your application, we will hold your Personal Data for 6 months, or according to the relevant directive of the Commissioner of Personal Data and/or other applicable law.</p>
<p>6. Transfer of your personal data outside the EEA or to an international organization</p>	<p>We may transfer your personal data to the following which are located outside the European Economic Area (EEA), only if the transfer is necessary to perform our contractual obligations, to fulfill your orders or when you have given your express consent:</p> <ul style="list-style-type: none"> • To other companies of Quality Group offices in other jurisdictions as in China and South Africa, • To Banks abroad. <p>Furthermore, under certain circumstances, we are obliged by law to transfer your data to third countries, for example by the tax legislation, the Cyprus-United States Transnational Agreement, (FATCA) etc.</p> <p>In any case, the processors in third countries will be obliged to apply the Regulation as well as any company within the EU.</p>
<p>7. Keeping your personal data secure</p>	<p>We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to have access to it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.</p> <p>We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.</p>
<p>8. Your rights</p>	<p>You have a number of important rights, under the Regulation. Specifically:</p> <p>(a) right to access your personal data (Article 15): meaning you might receive information and/or copy of the personal information we hold free of charge.</p> <p>(b) right to rectification (Article 16): you might ask us to correct any mistakes in your information which we hold.</p> <p>(c) right to erasure (“right to be forgotten”) (Article 17): you might ask us to erase the personal information concerning you.</p> <p>However, we reserve the right to deny the erasure, if the processing is necessary for compliance with a legal obligation, for reasons of public interests or for the establishment, exercise or defense of legal claims.</p> <p>(d) right to restriction of processing (Article 18): you might require us to restrict our processing of your personal data if you contest the accuracy of your personal data, the lawfulness of the processing, or you have objected to processing (according to article 21, see below) and you wait for our reply whether we have legitimate grounds which override yours.</p> <p>(e) right to data portability (Article 20): you have the right to request and receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit those data to a third party under certain circumstances.</p>

	<p>(f) right to object (Article 21): you have the right to object at any time to processing of personal data concerning you which is based on performance of a task carried out in the public interest or for the purposes of the legitimate interest pursued by us or third parties (article 6 (1) (e) and (f) of the Regulation).</p> <p>You also have the right to object at any time to processing of personal information concerning you for direct marketing or decisions being taken by automated means which procure legal effects concerning you or similarly significantly affect you.</p> <p>In case you exercise this right, we shall no longer process your personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claim.</p> <p>(g) right to withdraw your consent: you reserve the right to withdraw your consent at any time. However, the withdrawal of the consent does not affect the lawfulness of the processing based on consent before its withdrawal.</p> <p>If you wish to exercise any of the above rights or to ask any questions or clarifications, please do not hesitate to contact our Data Protection Officer dpteam@qualitydevelopments.com .</p> <p>If you like to exercise any of those rights, please:</p> <ul style="list-style-type: none"> • email or write to us or our Data Protection Officer • let us have enough information to indentify you • let us have proof of your identity and address • let us know the information to which your request relates. <p>Please note that if you would like to unsubscribe from any email newsletter you can also click on the ‘unsubscribe’ button at the end of the email newsletter. It may take up to five days for this to take place.</p>
<p>9. How to complain</p>	<p>We hope that our Company and specifically the Data Protection Officer can resolve any query or concern you raise about our use of your information.</p> <p>However, the Regulation also gives you right to logde a complaint with the supervisory authority, the Commissioner of Personal Data Protection. For more information concerning the process of filing a complain please visit the website www.dataprotection.gov.cy/) or via e-mail at commissioner@dataprotection.gov.cy .</p>
<p>10. Are you obliged to provide us with your personal data?</p>	<p>You are required to provide your personal data to the extent that it is necessary to conclude, perform or terminate the contract between us and to fulfill your mandates.</p> <p>Furthermore, we are obliged by the anti-money laundering legislation to collect and hold your personal information before conclude our contract. In case you refuse to give us your personal data, we will not be able to provide our services to you.</p>
<p>11. Automated individual decision-making</p>	<p>As a rule, we do not make automated decisions. If we make use of automated decision-making, you will be properly informed if this is necessary on the basis of the relevant legislation.</p>

<p>12. Is your data used for profiling?</p>	<p>‘Profiling’ means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s performance at work, economic situation, personal preferences, interests, reliability, behaviour, location or movements.</p> <p>We do not use your personal data for profiling.</p>
<p>13. Changes in this privacy notice</p>	<p>This Privacy Notice was published on 19-3-2019 and last updated on 19-3-2019 .</p> <p>We may change this privacy notice from time to time and in such case we will inform you via email.</p> <p>We also ask you to periodically visit our website for any updates of this privacy notice.</p> <p>Please contact us or our Data Protection Officer, if you have any questions about this privacy notice or the information we hold about you at dpteam@qualitydevelopments.com .</p>