



Cyp-Cana Alarms Ltd

P.O. Box 53042, 3300 Limassol, Cyprus

Tel: 7777 1966, (+357) 25 33 66 44 | Fax: (+357) 25 33 87 88

Email: info@cypcana.com | Website: www.cypcana.com

CYP-CANA ALARMS LTD

PRIVACY POLICY

WHO WE ARE

CYP-CANA ALARMS LTD is an active company in the security field established in Cyprus since 1980 as one of the first security companies on the island.

Our services include installation of Security systems (Burglar Alarm), Fire Alarms, Closed-Circuit Television systems (C.C.TV) and Access Control systems.

We offer monitoring/control services through the 24-hour Control/Receiving Centre of our company (since 1992), maintenance services, after-sales support as well as patrol services.

As a result of the long experience and the right cooperation with world-known manufacturers combined with the complete services of the 24/7 Control Centre, CYP-CANA ALARMS LTD is able to guarantee high quality products and services to its clients, providing total solutions to any safety need of a residence or business. Our base is in Limassol, offering services throughout Cyprus.

INTRODUCTION

CYP-CANA ALARMS LTD (“**we**” or “**us**” or “**our**”) is committed to protecting and respecting your privacy.

This policy statement (together with our terms of use and any other documents referred to on it) sets out the basis under which:

1. We, acting as a Data Controller, collect any personal data from you; and
2. you provide any personal data to us, as a Data Processor; and
3. we will process your personal data.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. Further to reading this privacy policy and entering into any agreement with us, it is assumed that you agree with the policy itself.

By visiting us at our Website www.cypcana.com (“**our Website**”), you are accepting and consenting to the practices described in this policy.



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For the purpose of the Regulation (EU) 2016/679 (General Data Protection Regulation) (“**GDPR**”), the data controller is CYP-CANA ALARMS LTD of Limassol, Cyprus.

Our nominated representative for the purposes of the GDPR is our Data Protection Officer, Mrs. Maria Panayiotou, who can be contacted at +357 77 77 19 66 or at accounts@cypcana.com .

DEFINITIONS

1. ‘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 as a name, an identification number, location data, 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;
2. ‘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; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
3. ‘processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as 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;
4. ‘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;
5. ‘consent’ of the data subject means 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;



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INFORMATION WE MAY COLLECT FROM YOU

Information we collect and process about you (provided by you):

We will collect and process data about you in the following ways:

- through written or verbal correspondence with you;
- when provided by you over the phone, via email or otherwise;
- in person when you meet with our staff or representatives;
- when you fill-in one of our forms for the services you would like us to offer to you;
- when provided by you during the installation of our safety systems at your location;
- when provided by you through our Website;
- when you apply for a quotation and when we provide you with it;
- when you subscribe to our services;
- when you register to our database/directories and software (24hrs monitoring/control center, technical and accounting);
- when you request for our service or information regarding our company and our services;
- when we proceed with a contractual agreement;
- when terminating your subscription with us and;
- when patrolling your premises upon your request or on a suspicious occurrence.

The data collected and processed may include, but is not limited to:

- your contact information, including your (first and last) name, telephone number (residential, private and related persons' telephone number), premises address (location and/or billing), directions to the premises address, directions to the billing address, structure of your premises, user codes, identification passwords and email address;
- relation to contact persons or information received by you (but not requested by us) for communication purposes, such as marital status;
- dates of holidays during which you are away from the premises;
- information about the event activations (status/arming/disarming) of the security system;
- financial and credit card information, details of any transactions you carry out with us;
- if you have contacted our customer service or being contacted by us, the details of such communication, the phone number used to call our customer service number, the contact history and recorded call; we use recorded lines/telephone system (the caller is informed that their call is being recorded for quality control purposes);
- technical information for the safety systems installed by us at your location such as type of system, type of equipment, zones, codes and history of maintenance visits;



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- Technical information such as the Internet Protocol (“**IP**”) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; information about your visit, including the full Uniform Resource Locators, clickstream to, through and from our Website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page;
- When applicable, visual verification may be obtained by the installed safety equipment through our secure server upon your consent, which you allow us to have access to only when required, such as in case of an alarm/suspicious event and in order for us to be able to service you in the most effective and efficient manner possible;
- Any information incidental to that listed above.

Please note that the data listed above does not apply to all customers; some may provide (or may need to provide) less information than listed and this will depend on the exact products/services which you have signed up for.

Information we receive from third parties: This is information we receive about you from a third party, Data Controller with whom we are contracted to provide a service.

It may also include information that we receive from other third parties (who are Data Controllers in their own right) including, for example, business partners, sub-contractors, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies.

Where we receive information from third parties we take all reasonable measures to ensure that the third party has a lawful basis for processing the underlying data before this is processed in any way by us.

COOKIES

Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website. For further information regarding Cookies, please refer to our Cookie Policy on our website.



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HOW LONG IS YOUR INFORMATION RETAINED

To ensure that personal data is kept for no longer than necessary, we have put in place an Archiving Policy for each area in which personal data is processed and will review this process annually. The archiving policy shall consider what data should/must be retained, for how long, and why. Where consent is relied upon contractual agreement for processing data, evidence of explicit opt-in consent shall be kept with the personal data and retained until termination of the contract following certain conditions.

We retain your information while you/your company remains an active client so as to deliver our services in the most effective manner. If you stop being an active/subscriber client, we will retain your information for future support (e.g. request for service) unless you request that your details shall be deleted; However, in this case we will only contact you for marketing purposes if we believe the information we intend to send to you could be of 'legitimate interest' to you/your company. If you have signed up to receive our newsletter / requested information from us, we will retain your information until you request it to be removed / deleted from our marketing communications lists. Where data cannot be deleted due to legal or other restrictions, it will be anonymised where possible in order to prohibit the identification of the data subject.

Recorded calls from and to our customer service and company telephone numbers are kept as a record for proving reasons, complain treatment, occurrence evidences and employee behaviour controlling for up to 5 years and then deleted safely and in such a manner that the recorded calls/data is irrecoverable.

The accounting and transaction history will be kept for up to 8 years and then deleted safely and in such a manner that the data is irrecoverable.

Subject to exceptions described below and the applicable law, we may retain your information after account deletion/termination of agreement:

- If there is an unresolved issue relating to your account, such as an outstanding invoice on your account. When this issue is resolved your data will be removed / deleted;
- Personal consent has been given for us to retain such information;
- There is a legal obligation, such as a court order; and
- If this is to the public's best interest (for example a criminal investigation).



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SECURING YOUR DATA

We shall ensure that personal data is stored and used securely using best practice. Access to your personal data shall be limited to authorised personnel who require access to provide a contracted product or service and appropriate security will be in place to avoid unauthorised sharing of information.

When personal data is deleted this will be done safely and in such a manner that the data is irrecoverable.

Appropriate back-up and disaster recovery solutions shall be in place as well as password protection for all devices that contain data, firewalls and encryption methods.

USE MADE OF THE INFORMATION

We use information held about you in the following ways:

- for the purposes of serving you and offering support and quality of services as well as to carry out our obligations arising from any contracts entered into between you and us;
- to provide you with information, products or services that you have requested from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- for administration, financial and accounting purposes;
- to notify you about changes to our service or regarding upgrades to our products;
- to allow you to participate in interactive features of our service, when you choose to do so.
- to contact you for feedback after a sale of a product or service or after a given quotation;
- to resolve any problems or disputes you may encounter in relation to our products and services. If you have contacted us with any complaints, feedback, comments, suggestions, we will use and disclose your personal data (including your contact history) to respond to you and provide you with the best service possible. If you are the complainant and you do not want us to disclose your identity to the party you are complaining about, you must let us know immediately. However, it may not always be possible to handle your complaint on the basis of anonymity;
- to ensure that content on our Website is presented in the most effective and safe manner for you and for your computer.

If you do not want us to use your data in any of the above mentioned ways, you can contact us to update your preferences any time at 77771966 or at accounts@cypcana.com



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We may also use your personal data for purposes connected or relevant to the business of our company such as:

- complying with legal and regulatory obligations and requirements;
- enforcing obligations owed to our company or an unresolved issue relating to your account, such as an outstanding invoice;
- researching and developing new products and services or improving existing products and services of our company;
- accounting, risk management, compliance and record keeping purposes;
- carrying out research, planning and statistical analysis;
- staff training.

When using your personal data to contact you for the above purposes, we may contact you in person, via regular mail, fax, e-mail, SMS, telephone or any other electronic means.

DISCLOSURE OF YOUR INFORMATION

We do not disclose information about identifiable individuals to our suppliers or business partners (eg insurance companies) or advertisers or sell your information to any other organisation for marketing or other purposes.

Your explicit agreement allows us to share your personal information with:

- selected third parties including:
 - business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
 - our consultants and professional advisers (such as accountants, lawyers, auditors).
 - analytics and search engine providers that assist us in the improvement and optimisation of our Website;
 - credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

Should we disclose your personal information to third parties we confirm that your personal data shall not be transferred to another entity, country or territory, unless reasonable and appropriate steps have been taken to establish and maintain the required level of data security and that:

- personal data may be communicated to third persons only for reasons consistent with the purposes for which the data were originally collected or other purposes authorised by law;
- all transfers of personal data to third parties for further Processing shall be Subject to written agreements, or under our Intra Group Data Transfer Agreement for internal Data transfers;



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- EU personal data shall not be transferred to a country or territory outside the European Economic Area unless the transfer is made to a country or territory recognised by the EU as having an adequate level of data security or to the United States under the EU-US Privacy Shield, and only if the US company is registered under the EU-US Privacy Shield.
- In case your data are transmitted to third parties; these parties have been rigorously assessed and offer a guarantee of compliance with the legislation on the processing of personal data. Where these parties have been designated as data processors they shall carry out their activities according to the instructions given by CYP-CANA ALARMS LTD.

Subject to the provisions of the above, personal data may be transferred where any of the following apply:

- the data subject has given Consent to the proposed transfer;
- the transfer is necessary for the performance of a contract between the data subject (personally or via his/ her employing company as our client) and us;
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between us and a third party; (e.g. police department)
- the transfer is necessary or legally required on important public interest grounds, or for the establishment, exercise, or defence of legal claims;
- the transfer is required by law;
- the transfer is necessary to protect the vital interests of the data subject.

Your personal data may also be shared

- in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
- if our or substantially all of our assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation such as a court order, request by the police, or in order to enforce or apply our Website [Terms of Use](#); or to protect our rights, property, or safety or the rights, property or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.



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WHERE WE STORE YOUR PERSONAL DATA

All information you provide us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a code and/or a password or any other credentials which enables you to access your safety system and us to identify you, you are responsible for keeping this information confidential. We strongly advise you not to share your code or your password or any other credentials with anyone.

YOUR RIGHTS

As the data subject, your rights are set out in Chapter 3 of the GDPR and includes the rights to:

- access your personal data;
- be provided with information about how your personal data is processed;
- be provided with the information of the personal data obtained from someone other than the data subject;
- have your personal data corrected;
- have your personal data erased in certain circumstances, (“the right to be forgotten”);
- object or restrict how your personal data is processed;
- have your personal data transferred to yourself or to another business in certain circumstances.

You have the right to ask us not to process your personal data for marketing purposes.

We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.

You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting our Data Protection Officer, Mrs. Maria Panayiotou, who can be contacted at +357 77 77 1966 or at accounts@cypcana.com.

Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites. The same applies when using any of the applications for accessing your safety systems (through the host provided by us).



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CHANGES TO OUR PRIVACY POLICY

This Policy was last updated on 20/05/2018.

Any future changes that we make to our Privacy Policy will be posted on this page. Please check back frequently to see any updates or changes to our Privacy Policy.

CONTACT

Questions, comments and requests regarding this Privacy Policy should be addressed to our Data Protection Officer, Mrs. Maria Panayiotou, who can be contacted on +357 77 77 1966 or at accounts@cypcana.com .

WHERE TO MAKE A COMPLAINT

If you have a complaint regarding any aspect of your personal data or this privacy policy, please write to us at the above address. If you are still not satisfied with the outcome of your complaint, you may write to the Commissioner's Office at the following address:

1 Iasonos str., 1082 Nicosia

P.O.Box 23378, 1682 Nicosia

Tel: +357 22818456

Fax: +357 22304565

Or via email at commissioner@dataprotection.gov.cy