

PRIVACY POLICY

Your privacy is important to us. This Privacy Policy describes what information and Personal Data ISPserver LTD collects, uses and processes about its customers (clients, users of its services) and across our website ispserver.com and how this information and Personal Data is used in the course of our business.

1. Information we may collect:

Customer Data

We may collect customer data for providing and operating services and/or products ordered by the customer. Customer's data may include the subscriber's (natural person) name, address, telephone number(s), id/passport number, date of birth, contact number, email address (where needed), direct debit details (where needed), billing address, credit check (for a possible guarantee), details of guarantors, the invoices issued per service per month, including payments made and disconnections, and customer's preferences regarding inclusion in our telephone directory service databases.

The following data is not erased:

- Data maintained for law enforcement purposes when lawfully requested to do so by a Court of law
- Data maintained for the purposes of taxation legislation (Law 95(I)/2000 and Law 4/1978), which are maintained for a period of six (6) years,
- Data processed for the purposes of legitimate interest (e.g an action against a customer), which are maintained until the legitimate purpose is completed
- Payment information referring to SEPA Direct Debit payments and information referring to the corresponding invoices settled which shall be maintained for a period of thirteen (13) months as per the SEPA rules.

Billing & Traffic Data

ISPserver LTD processes traffic and billing data for the purposes of providing electronic services and/or products to its customers, for billing purposes and for suggesting discounts, loyalty plans/programs, rewards or benefits on such services and/or products or to comply with our legal obligations. This data includes numbers called, location data, date, time and period of a call, network faults, IP addresses, email addresses, internet browsing, applications and features usage of the customer. Traffic and billing data is stored by ISPserver LTD for a period of six (6) months as provided by law. After the lapse of the six (6) month period this data is erased.

The following data is not erased:

- Data maintained for law enforcement purposes when lawfully requested to do so by a Court of law
- Data processed for the purposes of legitimate interest (e.g an action against a customer), which are maintained until the purpose is completed.

2. Collection and use of data

We may collect, hold, use and disclose information for the following purposes and personal information will not be further processed in a manner that is incompatible with these purposes:

- to enable you to customize or personalize your experience of our services;
- to contact and communicate with you;
- for analytics, market research and business development, including to operate and improve our services, associated applications and associated social media platforms;
- for advertising and marketing, including to send you promotional information about our products and services and information about third parties that we consider may be of interest to you (only in case You gave us consent for it);
- for internal record keeping and administrative purposes;

3. Legal bases for data processing

We will process your personal information lawfully, fairly and in a transparent manner. We collect and process information about you only where we have legal bases for doing so.

These legal bases depend on the services you use and how you use them, meaning we collect and use your information only where:

- it's necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract (for example, when we provide a service you request from us);
- it satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote our services, and to protect our legal rights and interests;
- you give us consent to do so for a specific purpose (for example, you might consent to us sending you our newsletter);
or
- we need to process your data to comply with a legal obligation.

Where you consent to our use of information about you for a specific purpose, you have the right to change your mind at any time (but this will not affect any processing that has already taken place).

We don't keep personal information for longer than is necessary. While we retain this information, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorized access, disclosure, copying, use or modification. That said, we advise that no method of electronic transmission or storage is 100% secure and cannot guarantee absolute data security. If necessary, we may retain your personal information for our compliance with a legal obligation or in order to protect your vital interests or the vital interests of another natural person.

4. Transferring of personal information to third parties

The personal information we collect is stored and processed in the Republic of Cyprus by default.

We may also disclose personal information to third party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, web-hosting and server providers, debt collectors, maintenance or problem-solving providers, marketing or advertising providers, professional advisors and payment systems operators, our employees, contractors and/or related entities and courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights.

5. Your rights and controlling your personal information

Choice and consent: By providing personal information to us, you consent to us collecting, holding, using and disclosing your personal information in accordance with this privacy policy. If you are under 16 years of age, you must have, and warrant to the extent permitted by law to us, that you have your parent or legal guardian's permission to access and use the website and they (your parents or guardian) have consented to you providing us with your personal information. You do not have to provide personal information to us, however, if you do not, it may affect your use of this website or the products and/or services offered on or through it.

Right of Access and data portability: You may request details of the personal information that we hold about you. You may request a copy of the personal information we hold about you. Where possible, we will provide this information in CSV format or other easily readable machine format. You may request that we erase the personal information we hold about you at any time. You may also request that we transfer this personal information to another third party.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this privacy policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Restrict: You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us using the details below. If you ask us to restrict or limit how we process your personal information, we will let you know how the restriction affects your use of our website or products and services.

Right of Updating, Rectification or Minimization of Personal Data: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading or out of date.

Notification of data breaches: We will comply laws applicable to us in respect of any data breach.

Complaints: If you believe that we have breached a relevant data protection law and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You also have the right to contact a regulatory body or data protection authority in relation to your complaint.

Right to Erasure ("Right to be Forgotten"): To unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

6. Cookies Policy

We use "cookies" to collect information about you and your activity across our site. A cookie is a small piece of data that our website stores on your computer, and accesses each time you visit, so we can understand how you use our site. This helps us serve you content based on preferences you have specified. Please refer to our **Cookie Policy** for more information.

7. Limits of our policy

Our website or services may link to external sites/sources that are not operated by us. Please be aware that we have no control over the content and policies of those sites, and cannot accept responsibility or liability for their respective privacy practices.

8. Changes to the policy

At our discretion, we may change our privacy policy to reflect current acceptable practices. We will take reasonable steps to let users know about changes via our website. Your continued use of this site after any changes to this policy will be regarded as acceptance of our practices around privacy and personal information.

If we make a significant change to this privacy policy, for example changing a lawful basis on which we process your personal information, we will ask you to re-consent to the amended privacy policy.

9. ISPserver LTD contact information / Complaints

Please contact ISPserver LTD's appointed Representative for any request, inquiry or complaint:
ISPSEVER LTD, lawdep@ispserver.com

This policy is effective as of 01 August 2022.