

Effective Date: 16/11/2022

*This **Privacy Notice** provides information for our processing of your personal data. By “your” or “you” we mean our clients/potential clients, associates, service providers and/or any other relevant parties and by “our” or “we” or “us”, we mean Dema Services Limited. We provide explanatory information regarding the purposes for which we process your personal data, how we process it and what technical and organizational measures we apply.*

1. Governing Laws & Regulations:

- 1.1. This Notice is governed by the Cyprus law 125(I)/2018 “Providing for the protection of natural persons with regard to the processing of personal data and for the free movement of such data” and any other relevant and applicable legislation.
- 1.2. The Cyprus law 125(I)/2018 has been enacted following the enforcement of the EU General Data Protection Regulation (“GDPR”) 2016/679, of the European Parliament and of the Council, of 27 April 2016.

2. Definitions:

- 2.1. “Personal data” means any information relating to you, by which you can be identified, directly or indirectly.
- 2.2. “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.
- 2.3. “Consent” means any freely given, specific, informed and unambiguous indication of a natural person’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.
- 2.4. “Supervisory authority” means an independent public authority which is established by a Member State.
- 2.5. “Personal data breach” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

3. Purposes for processing your personal data:

- 3.1. We process your personal data to be able to enter into a contractual relationship with you and in relation to our contractual relationship, in order to perform our duties towards you.
- 3.2. We might process your personal data if this is required by Law.
- 3.3. We might process your personal data to protect our legitimate interests.
- 3.4. We might process your personal data for other purposes for which we have obtained/will obtain your consent.
- 3.5. Your personal data might be processed if necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested to us.
- 3.6. We might process your personal data to protect your vital interests or of another natural person.

4. Means for processing your personal data:

- 4.1. We might process your personal data electronically, through the exchange of emails, through our website and through specialized software and the systems we have etc.
- 4.2. We might process your personal data in hard-copy form, through receiving documents or delivering/dispatching them, through shredding them where appropriate and through storing them in our physical files etc.
- 4.3. We might also process your personal data orally through a phone call, interview, physical meeting, video call etc.

5. Technical & Organizational Measures:

- 5.1. We apply appropriate internal policies and procedures for the collection, processing, storing and deletion/destruction of your personal data.
- 5.2. Your personal data are/will be accessed only by the relevant authorized personnel.
- 5.3. We regularly train our personnel about safeguarding the processing of your personal data.
- 5.4. We apply appropriate security measures to prevent unauthorized access to our software and systems, as well as to our premises.
- 5.5. We apply appropriate security measures to prevent any other type of breach of your personal data, such as loss, destruction, alteration, disclosure etc.

6. Personal data transfers outside the EEA:

For transferring your personal data outside the EEA, where required, for any of the purposes outlined in paragraph 3., we will apply the appropriate safeguards.

7. Your Rights (non-explicit list):

- 7.1. To request information regarding the processing of your personal data.
- 7.2. To request access to your personal data.
- 7.3. To request the rectification of your personal data that is inaccurate, as well as to have incomplete personal data completed, accordingly.
- 7.4. To request for the erasure/deletion of your personal data (“Right to be forgotten”).
- 7.5. To request that the processing of your personal data is restricted.
- 7.6. To object to the processing of your personal data.
- 7.7. To data portability.
- 7.8. To withdraw your consent, at any time, where it applies. Withdrawing your consent does not affect the lawfulness of the processing, completed before the date of withdrawal.

8. DPO contact details:

Capacity	Email Address
Data Protection Officer (DPO) / GDPR Consultant	dpo@demaservices.com / KiriakiC@siviriventures.com

9. Updates to this Notice:

Please review this website regularly for any changes to this Notice. The “Effective Date” at the top left of this page indicates when updates were last made.