

NETinfo Website Privacy Policy

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INTRODUCTION

This Privacy Policy (the “Policy”) set out below will govern the protection and processing of your personal data that is collected or submitted, by using the website <https://netinfo.eu/> (the “Website”) (regardless of where you visit it from).

The Website is owned and operated by NETinfo Plc (Registration Number 110368) a limited liability company registered at Aglantzia 23, NETinfo Building, 2108, Nicosia, Cyprus. (“we”, “our”, “us”).

This means that data which you transmit through our website, or in the case where you contact us through any means of communication mentioned in the Website, an entity of the Group may process your personal data on our behalf.

Please read this Policy carefully. By submitting your acceptance on the relevant notifications posted on the Website, you are deemed to have read, understood, agreed to and consented to the Policy.

This Policy should be read alongside the Website Terms and Conditions of Use found [here](#).

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

We are the controllers of your personal data.

COLLECTION OF PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Data retention: How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Purpose/Activity	Type of Data	Lawful Basis	Retention Period
To contact you when you communicate with us first.	(a) Name and Surname (b) Email (c) Telephone Number	Necessary for our legitimate interests (depending on the reason you contact us; we will reply back)	This depends on the reason for your primary enquiry
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences, heat mapping and session recording. We use the following analytics provider: Google LLC Phone: +1 855-836-3987 Visit: https://support.google.com	(a) Cookies (b) Usage Data	Necessary for our legitimate interests (to define types of customers to keep our website updated and relevant, to develop our business and to inform our marketing strategy)	We will not retain such information for more than a year

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. You can view our cookie policy below.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions:** You may give us your name, surname, telephone, email by contacting us through the post, telephone, e-mail or through any other means. This includes personal data you provide when you communication with us.
- **Automated technologies or interactions:** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies. Please see our cookie policy below for further details.
- **Third parties or publicly available sources:** We will receive personal data about you from various third parties such as analytics providers.

DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table above:

- The Entities of the NETinfo Plc.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (EEA).

In case we do transfer your data outside of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least that we use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

CHANGES TO THE POLICY

We reserve the right, at our discretion, to make changes to any part of this Policy. Should this Policy be amended, we will publish details of the amendments on the Website and we will post a notice on the Website to request your acceptance of the amended Policy.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

SEVERABILITY

If this Policy or any part of it should be determined to be illegal, invalid or otherwise unenforceable under the laws of any country in which this Policy is intended to be effective, then to the extent that it is determined to be illegal, invalid or unenforceable, it shall in that country be treated as severed and deleted from this Policy and the remaining terms of this Policy shall survive and remain in full force and effect and continue to be binding and enforceable in that country.

EVENTS BEYOND OUR CONTROL

We are not be responsible for any breach of this Policy caused by circumstances beyond its reasonable control.

PERSONS UNDER THE AGE OF 16

The Website is a general audience website that is not designed nor intended to collect personal data of persons under the age of 16. Persons under the age of 16 should not provide any personal data on this Website. We ask that parents supervise their children while online.

THE RIGHTS OF WEBSITE USERS WHO SUBMIT PERSONAL DATA THROUGH THE WEBSITE

If you submit or have already submitted to us, personal data about you through the Website, then you have the following rights under this Policy and the relevant legislation on the protection on personal data:

- You may at any time cancel the consent you have given us to process your personal data:
- You may at any time send us any of the following requests:
 - A request for us to permanently delete all or some of your personal data from our records.
 - A request for you to access your personal data that are in our records.
 - A request for us to provide you with a copy of your personal data that are in our records, in digital or hard copy form.
 - A request for us to update or correct your personal data that are in our records.
 - A request for us to forward to another party of your choosing, a copy of all or some of your personal data that are in our records.
 - A request for us to limit what we do with your personal data or to stop all processing of your personal data.

If you wish to exercise any of the above rights or if you wish to notify us of a breach of your personal data you will be able to do so by contacting us at any of the following:

NETinfo Plc

Address: 23 Aglantzias, NETinfo Building, 2108, Nicosia

Telephone: +357 22753636

Fax: +357 22765680

Email: privacy@netinfo.eu

You also have a right to lodge a complaint with the supervisory authority, The Office of the Commissioner for the protection of personal data, however we would appreciate the chance to deal with your concerns before you approach the supervisory authority.

At any time after providing your consent, you will have a right to withdraw it by visiting any of our stores or by contacting us electronically or in writing using the above contact details.

Please keep in mind that if you cancel your consent, or if you make a request for us to permanently delete personal data from our records, or if you make a request for us to stop all processing of your personal data, or if you make a request for us to limit what we do with your personal data, in a way that we are no longer in a position to effectively process a pending application, order for products, comment, suggestion or complaint you have submitted through the website, then we will not be in a position to respond.

CONTACTING OUR DPO OR THE OFFICE OF THE COMMISSIONER

Our appointed Data Protection Officer is the Law Firm D. Hadjinestoros & Co LLC who can be contacted at:

Address: Kyriakou Matsi 16, Eagle House, 8th Floor, 1082, Nicosia, Cyprus

Telephone: +357 22510165

Fax: +357 22318214

Email: dataprotection@dhadjinestoros.com

The competent authority in Cyprus for the enforcement of personal data protection legislation is:

The Office of the Commissioner for the protection of personal data

Address: Iasonos 1, 1082 Nicosia Cyprus or P.O.Box 23378, 1682 Nicosia Cyprus

Telephone: +357 22818456

Fax: +357 22304565

Email: commissioner@dataprotection.gov.cy

COOKIES POLICY

You can find information about the individual cookies we use and the purposes for which we use them in the table below:

COOKIE	TYPE	DURATION	DESCRIPTION
woocommerce_cart_hash	WooCommerce	at end of session	Contains information about the cart as a whole and helps WooCommerce know when the cart data changes.
woocommerce_items_in_cart	WooCommerce	at end of session	Contains information about the cart as a whole and helps WooCommerce know when the cart data changes.
wp_woocommerce_session_	WooCommerce	at end of session	Contains a unique code for each customer so that it knows where to find the cart data in the database for each customer. No personal information is stored within these cookies.
__utma	Google Analytics	2 years from set/update	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmt	Google Analytics	10 minutes	Used to throttle request rate.
__utmb	Google Analytics	30 mins from set/update	Used to determine new sessions/visits. The cookie is created when the javascript library executes and no existing __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmz	Google Analytics	End of browser session	Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with the __utmb cookie to determine whether the user was in a new session/visit.
__utmz	Google Analytics	6 months from set/update	Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.
__utmv	Google Analytics	2 years from set/update	Used to store visitor-level custom variable data. This cookie is created when a developer uses the _setCustomVar method with a visitor level custom variable. This cookie was also used for the deprecated _setVar method. The cookie is updated every time data is sent to Google Analytics.
cookie_notice_accepted	Cookie Notice	1 month	Acceptance of cookie usage.