

Privacy Notice

Pafilia Group takes the privacy of every person seriously. We are committed to safeguarding the privacy and non-public personal data of our users, clients, employees and associates, in accordance with European and International practices for privacy and data protection.

The General Data Protection Regulation – GDPR, regulation 2016/679 of the European Parliament and Council of the 27 April 2016 (hereinafter referred to as the “GDPR”), has recently been implemented and provides more strict guidelines to further enhance the data protection policies that the corporations who act as data controllers are following and more rights to individuals over how information about them is stored and used by organisations.

This policy applies where Pafilia Group is acting as data controller for non-public personal data, as per the provisions of the GDPR.

If you have legal interest in any matter relevant to the present policy or would like to contact our Data Protection Officer, please send us an email on datacontrol@pafilia.com.

Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information.

Pafilia Group

Pafilia Group is a group of entities constituted and operating in the Republic of Cyprus in the real estate, property management and immigration sectors.

Your non-public personal data is controlled by Pafilia Property Developers Ltd, a company duly incorporated under the laws of Republic of Cyprus, with registration number 33959.

“Affiliates” that may be used in this Privacy Policy, is defined as any entity which now or in the future controls, is controlled by, or is under common control with Pafilia Property Developers Ltd. “Control” is defined as the possession, directly or indirectly, of the power to direct or cause the direction of the management and policies of such person or entity, whether through the ownership of voting securities, by contract, or otherwise. If you would like to see a list of the list of companies of the Pafilia Group, please contact us at datacontrol@pafilia.com.

Depending on the services requested by you, your information is accessible to all group entities and processed by any one or more of such group entities.

Pafilia Property Developers Ltd and its Affiliates adhere to appropriate safeguards in line with GDPR for the processing of non-public personal data.

This Statement should be read in conjunction with our Cookies Policy.

What data do we collect

Depending on the nature of services you require from us, the non-public personal data that we may collect about you and, under certain circumstances, your spouse, civil partner, partner or dependants is information that identifies you as an individual, and it may non-exhaustively include the following:

- Full Name
- Date of Birth
- Gender
- Marital Status
- Postal address (including billing and shipping addresses)
- Telephone number
- Email address
- Organization and job title or function
- Passport or ID Number
- Criminal Record only when the processing is authorised by the Laws of the Republic of Cyprus
- Source of Wealth
- Bank Account Details
- Login ID or password for access to certain content on our websites
- Any other personal information that you choose to send us

We collect personal information from you through the use of enquiry and registration forms and every time you e-mail us your details.

We also collect information automatically about your visit to our site. The information obtained in this way, which includes demographic data and browsing patterns, is only used in aggregate form.

We use your IP address to help diagnose problems with our server, and to administer our web site.

We use customer contact information from the registration form to contact the member when necessary and to provide regular information on Pafilia Group.

Users may opt-out of receiving mailings by clicking on the unsubscribe button at the bottom of this page.

How we collect information

- **Information given by you**

We collect personal information from you through the use of enquiry and registration forms and every time you e-mail us your details.

- **Information collected from our website**

We collect personal information automatically upon your visit to our website through the use of cookies. You read our Cookies Policy [here](#).

- **Other Sources**

We collect personal information through your advisors, agents or other third parties in the standard course of our business only for the purposes of providing you certain services that you have requested.

Purpose of collecting personal information

We may use the non-public personal information we collect for several purposes as described below:

For providing a personalized service.

- For the purposes of complying with the terms of a contract that we have with you or with any other third party without compromising your rights and interests.
- To protect our legitimate interests or those of a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.
- For conducting market research surveys.
- For marketing purposes, strictly subject to your explicit consent.
- To comply with any laws and regulations or other legal obligations to which we are subject.
- For providing you with information about products and services we offer.

- To detect, prevent, and respond to actual or potential fraud, illegal activities, or intellectual property infringement.

We also use information in aggregate form (so that no individual user is identified):

- to build up marketing profiles
- to aid strategic development
- to audit usage of the site

Except for the purposes mentioned above, we may collect non-public personal information for any other legal purpose, provided your explicit consent has been obtained.

Disclosure of non-public personal information

Depending on the services you request from Pafilia Group and provided your consent has been obtained, we may disclose the non-public personal information that we collect as described below:

- With our Affiliates in Cyprus and/or across the world, who may act as joint data controllers or data processors to the company which will be the data controller for your data when you obtain our services and/or may provide administration, controls and reporting services.
- Professional advisors such as lawyers, accountants, financial advisors
- Financial institutions such as banks, insurance and investment companies
- Tax authorities and regulators for reporting purposes
- Governmental agencies or entities, regulatory authorities or other persons in line with any applicable law, regulations, court order or official request.
- To our authorized service providers to whom we may have delegated part of the services that you have requested from us.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by is among the assets transferred.
- To any other party for the purposes described in this Privacy Policy, provided that your consent has been obtained.

Storage of non-public personal data

The non-public personal data that we collect, will be stored and processed in Cyprus and/or in the Countries in which Pafilia Group above maintain offices.

We shall store your non-public personal data for a retention period which does not exceed 10 years from the date of termination/ completion of the purposes for which it was collected.

Notwithstanding the above, the above retention period may be extended in certain cases to enable us to use the data for defending potential legal claims, taking into account the applicable limitation periods under relevant laws, as well as, if applicable, to comply with Anti-Money Laundering/KYC laws and regulations, Anti-Bribery/Corruption Laws and regulations, accounting and tax laws, applicable to certain jurisdictions which we operate in.

In an effort to minimize the non-public personal data we collect which may identify you, we anonymize the data in the cases where it is no longer necessary to identify you from the data we hold.

Your rights

As a data subject you have certain rights under the GDPR, as follows:

- **Right to Access Information**

You have at all times the right to obtain confirmation from Pafilia Group as to whether or not any non-public personal data concerning you are being processed, and, where that is the case, access to the personal data. To obtain such information please contact us at datacontrol@pafilia.com.

Upon request, we can send you one electronic copy of the personal data we hold, concerning you, via email, without any charge. Pafilia Group retains the right to charge a reasonable fee in the event of repetitive or excessive requests.

- **Right to rectification**

You have the right to obtain rectification of inaccurate personal data about you as well as to have incomplete personal data completed, including by means of providing a supplementary statement.

- **Right to erasure**

You have the right to obtain erasure of personal data we have concerning you when your personal data is no longer required where:

- Your non-public personal data are no longer necessary in relation to the purposes for which they were collected.
- you withdraw your consent to us processing your personal data;
- your personal data has been unlawfully processed.
- Your personal data have to be erased for compliance with a legal obligation in Union or Member State law to which we are subject.
- **Right to restriction of processing**

You have the right to restrict our use of the non-public personal data we have concerning you, where:

- You contest the accuracy of the personal data we hold until we verify the accuracy of such personal data.
- The processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead.
- we no longer need your personal data for the purposes stated in this Privacy Policy, but you require it for the establishment, exercising or defending of legal claims or you have objected to our processing pending the verification whether the legitimate grounds of our processing activities overrode those pertaining to you.
- **Right to object**

You have the right to object at any time, to the processing of personal data concerning you, on grounds related to your particular situation as well as to the processing of personal data for marketing purposes. In order to submit an objection, please contact us via email at datacontrol@pafilia.com.

Careers

If you are applying for a job in Pafilia Group, the collection and use of your non-public personal data shall be governed by a separate policy, which you can review [here](#).

Changes to our Privacy Policy

This Privacy Policy was last updated on the 25th of May 2018.

Pafilia Group retains the right to modify or update the contents of this Privacy Policy from time to time.

Such modifications or updates will appear on this page and may be notified to you via email however you are expected to visit our website periodically and be updated about any changes.

No error free performance

Pafilia Group does not guarantee error-free performance under this Privacy Policy. We will use all reasonable efforts to comply with this Privacy Policy and shall take immediate rectification actions when we face a breach of this Privacy Policy. We shall not be liable for any incidental, consequential or punitive damages relating to a breach of this Privacy Policy.

Contact us

If you have any questions regarding this Privacy Policy, please contact us via email at datacontrol@pafilia.com.