

## **PRIVACY POLICY & GDPR**

We, HEIDI LAND, the operators of [www.heidilandkinder.com](http://www.heidilandkinder.com) (the “Website”) and the controllers of your data, with registered address 20 Parnasou Street, Strovolos, 2043 Nicosia, Cyprus and an email address [Heidi.Land@cytanet.com.cy](mailto:Heidi.Land@cytanet.com.cy) we are a business name registered with the Cyprus Registrar of Companies and we are existing under the laws of Cyprus. Any process of your personal data is performed only in accordance with this Privacy Policy and the General Data Protection Regulation (EU Regulation 2016/679).

**The Data Protection Officer’s contact details are:**

**Yioula Iacovou**  
**20 Parnasou Street, Strovolos, 2043 Nicosia, Cyprus**  
**+357 22814981**  
[Heidi.Land@cytanet.com.cy](mailto:Heidi.Land@cytanet.com.cy)

### **1. Data Collection**

Personal data, or personal information, means any information about an individual from which that person can be identified by (“Personal Information”). It does not include data that has been anonymized or pseudonymized.

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

#### **Persons who visit the Website / Smartphone Application without logging in or registering “guests”**

- Technical Data includes internet protocol (IP) address, which we pseudonymize (a technique that replaces or removes information in the dataset that identifies an individual), browser type and version, time zone setting and location, operating system and platform and other technology on the devices you use to access this Website.
- Usage Data includes aggregated information about how you use our Website, products and services.

#### **Persons who create an account “users”**

- Identity Data includes, username or similar identifier, date of birth and gender.
- Contact Data includes email address.
- Financial Data in case of purchases includes payment card details.
- Transaction Data in case of purchases, it may include details about payments to and from you and other details of products and services you have purchased or received from us.
- Technical Data includes pseudonymized internet protocol (IP) address, your login data, browser type and version, time zone setting and location, operating system and platform and other technology on the devices you use to access this Website.
- User Submitted Data includes data collected at your direction for a specific function, for example your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our Website / Smartphone Application, products and services.

- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share your data to produce and share aggregated insights that do not identify you. Aggregated data may be derived from your personal data but is not considered personal data as this data does 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 / Smartphone Application feature, to generate statistics about our users, to calculate the percentage of users accessing a specific Website / Smartphone Application feature, to calculate ad impressions served or clicked on, or to publish visitor demographics.

We do not collect special categories of Personal Information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, information about your health and genetic and biometric data). However, particular preferences depend on how you use our Website/ Smartphone Application and services.

To collect your Personal Information, we use direct interactions through which we collect information that you provide when carrying out search queries on our Website / Smartphone Application or by filling in forms on our Website / Smartphone Application, in particular at the time of registering to use our Website / Smartphone Application, subscribing to our service, posting material, taking part in surveys, entering a contest or promotion sponsored by us, when reporting a problem with our Website / Smartphone Application or requesting further services.

We also use automated technologies or interactions for the collection of your Personal Information. Further explanation for this method of collection can be found below.

## Cookies

If you have permitted your computer to accept cookies, our Website may use cookies.

Cookies are pieces of information that a website transfers to an individual's hard drive for record-keeping purposes. Cookies make web-surfing easier by saving preferences and browsing patterns, while you are on the Website. Cookies may be used to analyse the Website's usage and/or improve content and/or customize the Website's content and layout and/or for other customer service purposes.

Cookies enable us to relate your use of our Website to other information about you, including your personal information. All of these purposes serve to improve and personalize your experience on our Website. Most web browsers can be set to inform you when a cookie has been sent to you and provide you with the opportunity to refuse that cookie. However, refusing a cookie may, in some cases, preclude you from using and/or have negative impact on the display and/or the function of the Website and/or on certain other areas and/or features of the Website.

We use the following types of cookies and collection methods:

- Cookies that are strictly necessary: These are cookies that are required for the operation of our Website. These include, for example, cookies that enable a user to log in to our Website and to check if a user is allowed access to a particular service or content.

- Analytical cookies: These cookies allow us to recognize and count the number of users and to see how users use and explore our Website. These cookies help us to improve our Website, for example by ensuring that all users are able to find what they are looking for easily.
- Functionality cookies: These cookies are not essential but help us to personalize and enhance your online experience on our Website. This type of cookies allows us to recognize you when you return to our Website and to remember, for example, your choice of language.
- Targeting cookies: These cookies record the visit of a user on our Website, the pages a user has visited and the links a user has followed in order to enable us to make our Website more relevant to the users' interests.
- Web Beacons: Pages of our Website and our e-mails may contain small electronic files known as web beacons (also known as clear gifs, pixel tags, single-pixel gifs and web bugs) that are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of web users or to access cookies.

### **Third-party Use of Cookies and Other Tracking Technologies**

Some content and/or applications, including advertisements, on the Website are served by third parties, including advertisers, ad networks and servers, content providers and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. Unless expressly stated otherwise, our website does not provide any Personal Information to these third parties, however they may collect information, including Personal Information, such as internet protocol (IP) address, browser type and version, time zone setting and location, operating system and platform and other technology on the devices you use to access this Website. They may also use this information to provide you with interest-based advertising or other targeted content.

Note that, we do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

## **2. Data Usage**

Your Personal Information will be used only in accordance with the provisions of the applicable local and EU law. In the normal course of events your Personal Information will be used in the following circumstances:

- For purposes of providing the services, customer management and functionality and security as is necessary to perform the services provided to you under our term and conditions and any other contract that you have with us.
- 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 or regulatory obligation.
- Where you declare your valid consent to use it.

## **Personal Information usage purposes.**

In general, the information that we collect from you and/or the information you provide us with, including Personal Information and Sensitive Personal Information, will be used for the following purposes:

- Provision of services (Users Only): to present our Website / Smartphone Application and their content to you, including any interactive features on our Website / Smartphone Application and to provide you with information, products or services that you request from us;
- Customer management (Users Only): to manage a user's account, to provide customer support and notices about his/her account and/or subscription, including expiration and renewal notices, and notices about changes to our Website / Smartphone Application or any products or services we offer or provide through them;
- Customization of content (Users Only): to perform research and analysis about your use of, or interest in, our Website / Smartphone Application content, products, or services, in order to develop and display content and advertising tailored to your interests on our Website / Smartphone Application and other sites;
- Analytics: to determine whether users of the Website / Smartphone Application are unique, or whether the same user is using the Website / Smartphone Application on multiple occasions, and to monitor aggregate metrics such as total number of visitors, pages viewed, demographic patterns;
- Functionality and security: to diagnose or fix technology problems, and to detect, prevent, and respond to actual or potential fraud, illegal activities, or intellectual property infringement;
- Compliance: to enforce our Terms & Conditions and to comply with our legal obligations; or for any other purpose with your consent provided separately from this privacy policy.

### **3. Disclosure of Information**

We may be required to release certain data to comply with legal obligations or in order to enforce our Terms & Conditions and/or to enhance our services. We may also release certain data to protect the rights and/or property and/or the safety of our Users and/or of our Guests and/or of others and/or of our Website/ Smartphone Application.

Although we do not monitor and/or actively seek to identify any illegal material posted and/or any illegal action made through and/or on the Website/ Smartphone Application, we reserve the right to provide the necessary information without notice to the competent authorities (i.e. police and/or other governmental and/or investigation authorities) for the identification of the User and/or the Guest and/or any other individual who acted illegally and/or against the provisions of our Terms & Conditions and Privacy Policy.

If you upload any material which is found to be infringing any intellectual property rights, we reserve the right to provide the necessary information to the respective copyright owners when deemed necessary and legally appropriate.

#### **4. Changes to our Privacy Policy**

We reserve the right to modify and/or revise and/or amend the terms of this Privacy Policy at any time in our sole discretion. You are expected to periodically review the most up-to-date version of this Privacy Policy so you are aware for any modifications and/or revisions and/or amendments.

Although the Users and/or the Guests may be notified for any changes to the Privacy Policy, we do not guarantee such notification.

Any changes take effect immediately upon being posted on the Website. The modified and/or revised and/or amended version supersedes any prior versions of the Privacy Policy upon being posted on the Website.

Upon continuing to use the Website / Smartphone Application you acknowledge, agree and consent to the updated Privacy Policy.

#### **5. Personal Information Storage Duration**

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 unauthorized 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 requirements.

Where we no longer need to process your Personal Data for the purposes set out in this Privacy Policy, we will delete your Personal Data from our systems.

Where permissible, we will also delete your Personal Data upon your request. Information on how to make a deletion request can be found under "Your Rights Related to Your Personal Information".

#### **6. Marketing and Advertising Messages**

Subject to your separate consent, we may send you marketing and advertising messages about our services to your email address. You can withdraw your consent to receive marketing and advertising messages as described above at any time by sending us an email to [Heidi.Land@cytanet.com.cy](mailto:Heidi.Land@cytanet.com.cy).

If you provide such separate consent, we may also use your collected information to customise such marketing and advertising messages as well as collect information on whether you opened such messages and which links in their text you followed.

We have a legitimate interest in processing your information for customising marketing and advertising messages you agreed to receive as it avoids that you receive marketing and advertising messages that are not relevant for you.

#### **7. Miscellaneous**

The Website's / Smartphone Application Users, are responsible for keeping their password confidential. If any unauthorised party gains access to their account on the Website / Smartphone

Application and/or other personal information, we will not be responsible for any damage and/or illegal action and/or illegal and/or other activity that may occur.

While we use commercially reasonable physical, managerial and technical safeguards to secure your information, we bring to the attention of all Users on the Website/ Smartphone Application, that the transmission of information via the internet is not completely secure and we cannot ensure and/or guarantee the confidentiality and/or the security of any information and/or content you transmit to us.

This Website / Smartphone Application shall not be responsible or liable (whether in civil, tort or otherwise), under any circumstances for any amount or kind of loss or damage (including without limitation, any direct, indirect, punitive or consequential loss or damages, or any anticipated loss of profit, loss of profit, loss of opportunity, loss of data, costs and fines and/or any special or incidental damages of any kind) that may result to you or a third party arising from or connected in any way to cyber-attacks, computer viruses, system failures or malfunctions which may occur in connection with your use of the Website/ Smartphone Application.

## **8. Your Rights Related to Your Personal Information under GDPR**

Subject to the regulation, you have certain rights regarding the Personal Information we collect, use or disclose and that is related to you, including the following rights:

- to receive information on the Personal Information concerning we hold about you and how such Personal Information is used (right to access); Art.15 of GDPR
- to rectify inaccurate Personal Information concerning you (right to data rectification); Art. 16, 19 of GDPR
- to delete/erase your Personal Information (right to erasure/deletion, “right to be forgotten”); Art. 17, 19
- to receive the Personal Information provided by you in a structured, commonly used and machine-readable format and to transmit that Personal Information to another data controller (right to data portability)
- to object to the use of your Personal Information where such use is based on our legitimate interests or on public interests (right to object); Art. 21 of GDPR and
- in some cases, to restrict our use of your Personal Information (right to restriction of processing).

If we ask for your consent to use your Personal Information, you can withdraw your consent at any time. Note that in case of a withdrawal of your consent you may no longer able to use several functionalities of our Website / Smartphone Application and our services.

You may, at any time, send us an e-mail to [Heidi.Land@cytanet.com.cy](mailto:Heidi.Land@cytanet.com.cy) to exercise your above rights in accordance with the applicable legal requirements and limitations. If you are located in the European Economic Area, you have a right to lodge a complaint with your local data protection authority.