

PRIVACY AND COOKIES POLICY

This Privacy Policy applies to our websites, including www.ipcyprus.com and www.ipcouncil.eu, and the services available through our websites (together, our "Sites").

This Privacy Policy is intended to disclose how Ioannides, Cleanthous & Co LLC (US) ("IP Cyprus" herein) collects, uses and discloses personal information about users of our Sites, as well as to explain the choices and right individuals have regarding their personal information.

This Policy intends to comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the "General Data Protection Regulation" or "GDPR") and provide appropriate protection and care with respect to the treatment of your personal data in accordance with the GDPR.

This Policy also applies if you contact us or we contact you about our Services.

1. Who we are

Ioannides, Cleanthous & Co LLC (hereinafter "IP Cyprus") is a company registered in Cyprus with registration number 336980 whose registered office is at 4 Promitheus Street, 1st floor, 1065, Nicosia – Cyprus.

IP Cyprus is the controller and the responsible for this website.

In case you have any questions and/or you need any clarifications about this Policy, including any request to exercise your rights (as per the Clause 4 below) please contact the data privacy manager using the details set out below:

Email: info@ipcyprus.com

Address: 4 Promitheus Street, 1st floor, 1065, Nicosia - Cyprus

Telephone number: +35722270638

Please, also, note that in case you are not satisfied with our response, you have the right to make a complaint at any time to the Privacy Commissioner of Cyprus, who is the Authority responsible for the protection of personal data.

This Policy was updated on May 2018.

2. Personal data we collect

Personal data means any information about an individual from which that person can be identified.

We may collect, store and transfer the following personal data:

- Name, company name and title/position.
- Email address, phone number, mailing address and contact details.
- Contact preferences and interests.
- Business affiliations.
- Other information related to your request or inquiry.

Automatically-collected information

We use cookies, log files, pixel tags, local storage objects and other tracking technologies to automatically collect information when users access or use the services or visit our Site, such as an IP address, general location information, domain name, page views, a date/time stamp, browser type, device type, device ID, Internet service provider ("ISP"), referring/exit URLs, operating system, language, clickstream data, and other information about the links clicked, features used, size of files uploaded, streamed or deleted, and similar device and usage information.

3. How and why we use your personal data.

We use your personal data to:

- Make our services available to you. This means that processing your data allows us to process your orders and possible refunds. We will not be able to provide you with our products and services or help you with any orders and possible refunds claims, if you do not provide us with this data.
- Manage and improve our operations. This means that we can communicate with you via email, post or online for marketing or advertising relating to our products and services. We will send you relevant news about our activities and services in a number of ways including by email, but only if you have previously agreed to receive these marketing communications. You can change your marketing choices any time.
- Contact and interact with you. This means that we can use your telephone number, email or address in order to get in touch with you for any issue related to our services. You always have the choice about whether to take part in our research and this does not affect your rights.

The methods we use to collect data from and about you are the following:

- Direct interactions: Using our Contact Form you submit your title, name, surname, telephone number, country, company and email.
- Automated technologies or interactions: When you interact with your websites, we may automatically collect information about your browsing actions and history. This information is collected using cookies. Please see our clause 8 below for further information.

4. Your rights

At any time you have the following rights related to your personal data:

- Request access to your personal data.
This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of your personal data
This enables you to correct any incomplete or inaccurate data we hold about you. Please note that we might need to confirm the accuracy of the new data you will provide us.
- Request erasure of your personal data
This enables you to ask us to delete or remove personal data. You can exercise this right where you have successfully exercised your right to object to processing (as per below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note however that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data.
When there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your rights and freedoms you have the right to object to processing of your data. You can also exercise this right where we are processing your personal data for direct marketing purposes. Please note that under certain circumstances we may demonstrate that we have compelling legitimate grounds to process your data which override your rights and freedoms.
- Request restriction of processing your personal data.
This enables you to ask us to suspend the processing of your personal data in the following cases:
 - (a) if you want us to establish the data's accuracy
 - (b) where our use of the data is unlawful but you do not want us to erase it
 - (c) where you need us to hold the data even if we do no longer require it as you need it to establish, exercise or defend legal claims
 - (d) if you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- Request transfer of your personal data to you or to a third party.
We will provide you with your personal data in a structured, commonly used format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform an Agreement with you.
- Right to withdraw consent.
You can exercise this right at any time where we are relying on consent to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the above rights and/or if you want further assistance on any of the above rights, please send us an email to info@ipcyprus.com

5. Sharing information with third parties

We may share personal data with other professionals and/or organisations in the following cases:

- Third party service providers that provide services to us or to whom we outsource certain services, such as data hosting or software or technology services.
- Our professional advisers, such as lawyers and accountants.
- Government and/or regulatory authorities.
- Professional indemnity insurers.
- Regulators, tax authorities and/or corporate registries.

Please also note that under the following circumstances we may share personal data with other organisations:

- In case the law or a public authority states that we must share this information for administration purposes or justice
- In case we need to share this personal data in order to establish, exercise or defend our legal rights.
- In case we restructure, sell or transfer our business or part of it.

6. How we protect your rights.

We understand how important it is to protect and manage your personal data. This is why we limit access to your personal data to those employees, agents and any third parties who it is required for their business 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 the Cyprus National Commissioner of any breach where we are legally required to do so.

Whilst we take appropriate technical and organisational measures to safeguard your personal data, it is important that you keep your devices and login information protected from unauthorised use.

7. Time

We will not keep your personal data longer than we need to. How long depends mainly on factors such as:

- Why we collected it in the first place
- How old it is
- Whether there is a legal/regulatory reason to keep them
- Whether we need them to protect you or us.

8. Cookies

We use cookies for a wide range of purposes on our website and in our email communications to deliver our services and to improve your experience.

Cookies are small bites of information that are stored by your browser on your computer's hard drive. Every time you revisit our website, your web browser sends these cookies back to us so that we can customise your experience to better match your interests and preferences or to simply facilitate your signing in to use our services.

We may use essential cookies in order to enable you to receive the services that you request via our website. Without these cookies, services that you have asked for cannot be provided. In particular, these cookies may be used to:

- Efficiently navigate from page to page in the website
- Store your user name and preferences included
- Avoid entering the same information (such as name, surname and telephone number) several times during the visit.
- Display targeted advertising information based on the interests and behaviour expressed by you while surfing.

Category of cookies:

- Authentication
If you sign in to our websites, cookies help us show users the right information and personalise the experience to the users.
- Security
We use cookies to enable and support our security features, and to help us detect malicious activity violations.
- Performance , Analytics, Research and Advertising
Cookies help us learn how well our site and web products perform in different locations. We also use these to understand, improve and research products, features and services, including when you access our websites from our websites, applications and devices. We also use third party cookies to improve and personalise our marketing messages/communications with you.

To better understand how visitors to our websites use our services and to help us improve the user experience, we use third-party analytics providers that place cookies on your browser.

Generally those third party technologies help us customise content and advertising and provide social media features and analyse traffic to the site.

Our websites mainly uses Google Analytics and Facebook Pixel tracking. Google Analytics uses cookies to collect visitor behaviour information in an anonymous form. Therefore no personally identifiable information is collected about you unless you explicitly submit that information on our websites.

The anonymous information generated by Google Analytics cookies about your use of our websites is transmitted to Google – not us.

Facebook Pixel tracking is an analytics tools that allows us to measure the effectiveness of our social advertising by understanding the actions people take on our website. We use website data collected by Facebook Pixel to make sure our advertisements are being promoted to the people who showed interest in our websites and in particular in our services and products. The data collected by Facebook Pixel includes IP address, the browser used and other data such as the number of visitors, which visitors are Facebook users. Facebook Pixel tracking cookie about your use of our websites which is then transmitted to Facebook – not us.

Users can control and/or delete cookies as they wish.

Users can delete all cookies that are already on their computer and they can set most browsers to prevent them from being placed. If they do this, however, they may have to manually adjust some preferences every time they visit a website.

How to contact us

If you have any questions about how we collect, store and use your personal data please contact us:

Email: info@ipcyprus.com

Telephone: +35722270638

Mail: 4 Promitheus Street, 1st floor, 1065, Nicosia - Cyprus

We try to respond to all legitimate requests within 5 weeks. Occasionally it may take us longer if your request is particularly complex or you have made a number of requests. In this case we will notify you and keep you updated.

We reserve the right to change this Policy at any time, so please check back regularly to keep informed of updates.