REVISION TABLE REVISION NUMBER	DATE	MODIFICATION DESCRIPTION

	COMPILATION:	APPROVAL:
POSITION:	Data Protection Officer	P.D.L.G.O. (Pafos District Local Government Organisation) President of the P.D.L.G.O.
NAME:	Advanced Quality Systems S.A	

1 PURPOSE

The purpose of this Policy is to define and formulate the general framework and basic principles set and applied by the Paphos District Authority (hereinafter referred to as "the Organisation") regarding the processing of personal data and for the protection of their security, confidentiality, integrity and availability.

2 SCOPE

This Policy applies to all personal data managed by the Organisation in the context of its activity.

3 POLICY IMPLEMENTATION OFFICER

- Administration-Data Controller
- All the staff of the Organisation
- All partners who manage and/or access personal data

4 DESCRIPTION

4.1 General

Our Agency recognizes and respects the importance of the personal data it handles in the context of its activity, and for this reason it has fully adapted its policy to the requirements of the General Data Protection Regulation (hereinafter GDPR) 2016/679/EC.

With this statement, our Organisation wishes:

- to inform the people dealing with it in what capacity, for what purpose and on what legal basis it processes personal data, i.e. information that may serve to directly or indirectly identify persons
- identify the categories of data, the sources of the data (where the data are not provided by the person himself/herself) and the criteria for determining the period of time for which the personal data are retained
- to inform the parties dealing with it regarding transfers of their personal data to third parties or to third countries
- to inform about the ability of subjects to contact our Agency on any issue related to the processing of their personal data, the ability to exercise their rights of access, correction and, where appropriate, erasure, restriction and opposition to processing, as well as the ability of individuals to report any violation of their rights related to their personal data to the Data Protection Authority Personal
- to define the principles governing the Agency's compliance with the relevant personal data protection policies and safeguards
- For any question or query, or anyone wishing to receive a copy of this statement, or wishing to exercise any of the rights related to his/her personal data, the interested party may contact:

a) Data Controller:

Name: P.D.L.G.O. (Pafos District Local Government Organisation)

Address: 11 Charalambou Mouskou Street, Korytsa Corner, P.C: 8010

P.O Box: 60474, 8103 Pafos

Phone: 26818202

Email: Contact

and/or

b) Data Protection Officer (DPO) of our Organisation, a company

"Promoted Service Systems S.A., by phone 210-6216997 and by email dpo@aqs.gr .

4.2 Data Controller, Data Protection Officer and Data Protection Officer

Data Controller:

Name: P.D.L.G.O. (Pafos District Local Government Organisation)

Address: 11 Charalambou Mouskou Street, Korytsa Corner, P.C: 8010

P.O Box: 60474, 8103 Pafos

Phone: 26818202

Email: Contact

Data Protection Officer:

Name : Advanced Quality Systems S.A.,

Address: 1A Sarantaporou Street & Tyrnavou Street,145 65 Street, Agios Stefanos Attica

Phone:210-62 16 997

Email: Contact

4.3 Who collects personal data?

Our Paphos District Local Government Organisation (P.D.L.G.O.) is based at:

Address: 11 Charalambou Mouskou Street, Korytsa Corner, P.C: 8010

P.O Box: 60474, 8103 Pafos

This statement covers the collection of personal data by our Agency in the course of conducting its business, including its presence on third-party websites, platforms and applications under our Website Terms of Use.

It is noted that during your visit to our Organisation's Website, simple data related to your interaction with the website and the installation of cookies is collected (see the relevant Cookie Policy). Third-party websites, in general, apply their own privacy statements and their own terms and conditions. We encourage you to read them before using these websites.

4.4 How is my personal data collected?

We may collect personal data from various sources, namely:

- Personal data provided to our Organisation **directly** by the subjects, for one of the following reasons:
  1. Information that you give us during the conclusion, development, and termination of the contractual relationship between us.
  2. Information you give us when you contact us or submit a request.
  3. Information you give us when you subscribe to our Organisation's newsletter.

- We also receive personal information indirectly, in the following cases:
  1. Data we collect during the operation of closed-circuit video surveillance (CCTV) at the Agency's premises
  2.
- We also receive and store certain types of personal data whenever anyone interacts with us **online**, i.e. when we use cookies and tracking technologies to receive personal data, and also the web browser used by the internet user accesses our website or listings, as well as other content displayed by or on behalf of the Agency to others websites.

4.5 What personal data is collected?

Personal Data means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one whose identity can be established, directly or indirectly, in particular by reference to an identifier, such as a name, an identity number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

Due to the nature of our Organisation's activities, the Personal Data it collects mainly concerns the following categories of subjects:

- **Employees of the Organisation**: i.e. their personal data and data that refer purely to the employment relationship with our Organisation, which include indicative identity and communication data, financial data as well as health data of the same

or additional members related to the compliance of our Organisation with labor and insurance legislation.

- **Candidates for recruitment**: i.e. their personal data and data referred to in their evaluation as candidates and in their recruitment procedures by the Agency, which include indicative identity and contact details, as well as details of the candidates' professional curriculum vitae.
- **Partners of the Organisation** (suppliers and other partners in general): i.e. their personal data and data referring to the contractual relationship between us, which include indicative identity and communication data, transaction data as well as financial data related to the compliance of our Organisation with its legal contractual obligations.
- **Dealing with the Organisation** (citizens and in general all kinds of persons who communicate and/or transact with our Organisation): i.e. their personal data and data that refer to the contractual relationship between us, where it exists, or that are used for their communication with our Organisation, which include indicative identity and communication data, transaction data as well as financial data related to the compliance of the Organisation to its legal contractual obligations.
- Furthermore, Personal Data may be collected from natural persons who enter the Organisation and its facilities during the operation of the closed-circuit video surveillance (CCTV), for reasons of security of persons and goods.

Please note that we **do not** collect special categories of personal data, other than the health data referred to herein, such as personal data relating to race, national origin, religion, sexual orientation or genetic biometric data, etc., which are categorized as special categories of data and receive additional protection under European personal data protection legislation.

4.6 Especially with regard to children's privacy

Personal data of children may be collected exclusively in the context of the employment relationship of our employees, i.e. on the one hand to describe the marital status of employees regarding issues of remuneration, labor rights, etc. It is understood that this information is provided with the consent of the person who has parental responsibility of the child (see below).

4.7 What is my data used for?

The purpose of the processing is proportional to the function performed at any given time. Especially:

- The personal data of the **employees** are provided to our Organisation for the purpose of concluding, executing or terminating the respective employment/cooperation contract. Also, the personal data of the employees regarding attendance , absences, hours of attendance, leaves, medical documentation of sick leaves, are kept for the purpose of granting leaves, including sick leave, while the personal data relating to the service of sick leaves. employees are provided by the heads of the individual departments for the purpose of evaluating personnel by the Organisation.
- The personal data of the **candidate employees**, which they themselves provide during the individual stages of selection and evaluation of candidates, are disclosed to the competent Department of the Organisation and to the Administration, for the purpose of informing the Organisation, evaluating, interviewing, etc., for the recruitment of employees and the conclusion of cooperation.
- The personal data of **citizens, partners and generally those dealing** with the Organisation, which they themselves provide to our Organisation, are collected and processed for the purpose of concluding and developing the contractual relationship between us, when it exists, our compliance with our legal contractual obligations and, where appropriate, our communication with them upon their request.
- The surveillance of the entrance as well as the other facilities is also carried out with **CCTV image recording cameras**. Any incoming person (employee or visitor) at the premises is informed in an appropriate, visible and understandable way (signs) about his entry into a CCTV area for reasons of safety and protection of persons, goods and critical infrastructures and other legal elements.

4.8 What is the legal basis for processing?

The collection and processing of personal data of the above subjects is based on:

a) No. 6 par. 1 c. a' GDPR: when you have consented to the processing of your personal data for one or more specific purposes, of which you have previously been fully informed.

b) no. 6 par. 1 c. b) GDPR: processing is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract with our Agency.

c) no. 6 par. 1 c. c' GDPR: processing is necessary for compliance with our legal obligations.

d) no. 6 par. 1 c. e' GDPR: the processing is necessary for the performance of a task performed in the public interest or in the exercise of public authority entrusted to our Agency.

e) no. 9 par. 2 c. b' GDPR (concerns special category – sensitive – personal data, such as health data): the processing is necessary for the performance of our obligations and the exercise of specific rights of us or yours as data subjects in the field of labor law and social security and social protection law.

4.9 Profiling

The Agency does not use personal data to create profiles.

4.10 Data Transfer to Third Parties: To whom will my data be shared?

As a rule, the Agency does not share data with third parties, except in the following cases. Especially:

- The Organisation transmits personal data of its employees, customers and associates to external partners (e.g. chartered accountants, computer engineers, legal advisors, etc..), with whom it has signed a contract that binds them in their capacity as processors with regard to the confidentiality, security, integrity and availability of your personal data.

We would like to point out that the above partners have access to the personal data necessary to perform their functions, but it is forbidden to use them for other purposes, in addition they have previously committed themselves to our Organisation for their relevant obligations regarding the non-use of the data for a purpose other than the execution of the processing; the observance of confidentiality and general compliance with the Regulation.

4.11 How long is my personal data kept?

The Agency retains your personal data for as long as the purpose of processing lasts. Upon its expiry, the Organisation retains, lawfully, your personal data, when necessary, for compliance with its legal obligation, arising from provisions of EU or National Law, as well as

in the event that the retention is necessary for the establishment, exercise or support of legal claims of the Paphos EDA.

- Personal data of employees and visitors originating from a **closed circuit video surveillance system** operating in our premises, including the entrance and selected workplaces, are kept for 1 month in a CCTV recorder, without prejudice to more specific provisions of the legislation applicable to specific categories of controllers. In the event of an incident concerning the purpose of the processing, the controller is allowed to keep the downloads in which the specific event has been recorded in a separate file for three (3) months. After the above period of time, the controller may retain the data for a longer specific period of time only in exceptional cases where the incident requires further investigation. In this case, the controller has the obligation to inform the Authority of the necessary period of time for the observance of such downloads.

4.12 What are my Rights?

The processing of your personal data is also linked to your respective rights, which, without prejudice to provisions that may restrict the exercise thereof, are:

- **Right to Information**: You have the right to receive clear, transparent and understandable information about how we use personal data and what your rights are. For this purpose we provide you with the information in this Statement – Privacy Policy and we encourage you to contact us for any clarifications.
- **The right of access:** You have the right to receive a) confirmation regarding the processing of your data and b) a copy of this data.

Our Organisation may refuse to satisfy the right of access, if your data also includes personal data of another person, unless:

- The other person has consented to the sharing of their data or it is reasonable for you to be provided with such information without the consent of the other person.
- In order to make the relevant decision, our Agency will need to adjust your right of access against the other person's rights regarding their own information.

DEYAP is also entitled to refuse the satisfaction of the right of access when it is manifestly unfounded or abusive.

- **The right to rectification:** You can ask us to correct or complete your data if it is incomplete or contains inaccuracies.
- **The right to the portability of your data**: You can request that we give you or transfer to a third-party provider in electronic form certain information that you have provided to us.

  The right to portability can only be exercised by you when the following conditions are cumulatively met:

  - Personal data is processed by automated means (i.e. paper files are excluded).
  - The legal basis for the processing is either your consent or the performance of a contract to which you are a party (Article 6(1b) GDPR).
  - The personal data relates to you as the data subject and has been provided by you.
  - The exercise of the right does not adversely affect the rights and freedoms of others.

- **The right to erasure**. You have the right to request the deletion of personal data concerning you if you no longer wish these data to be processed and if there is no legitimate reason for them to be held by EOAP as Data Controller.

  In particular, this right is exercised:

  - where the lawful basis for the processing is your consent and you withdraw it, then, if there is no other legal basis for the processing, the data must be deleted.
  - where your data is no longer necessary in relation to the purposes for which it was collected or otherwise or unlawfully processed, or if you object to the processing and there are no compelling and legitimate grounds for the processing, and finally;
  - if the data was collected unlawfully or when you were a child in the context of an on-line service.

It should be noted, however, that this is not an absolute right, as the further retention of personal data by EOASP is lawful, when it is necessary for reasons such as compliance with a

legal obligation of our Organisation or for the establishment, exercise or support of legal claims.

Pafos District Local Government Organisation is entitled to refuse the deletion of data in the following cases:

- When the retention of data is necessary for reasons of freedom of expression and the right to information.
- When the retention of your data is a legal obligation.
- When the retention of your data is necessary for public health reasons.
- When the retention of your data is necessary for the establishment, exercise or defence of legal claims.
- Where the deletion of your data would make it significantly more difficult or impossible to process it for scientific or historical research purposes.

- **The right to restriction of processing**. You have the right to restrict the processing of your personal data.
- **The right to withdraw consent**. If you have given your consent to the processing of your personal data, you have the right to withdraw your consent at any time by contacting us at the details provided herein.
- **The right to object:** you can object to the processing of your data carried out in the context of the pursuit of our legitimate interests, as set out above.
- **The right to lodge a complaint with the Office of the Commissioner for Personal Data Protection.** You have the right to lodge a complaint directly with your local supervisory authority, Data Protection Authority regarding how we process your personal data.
- **Rights related to automated decision-making**. You have the right not to be subject to a decision based solely on automated processing that has legal or other significant consequences for you. In particular, you have the right to:
  - human intervention must be involved,
  - express your opinion,
  - get an explanation for the decision that came after an assessment.
  - to challenge this decision.

In case of exercising one of the above rights, we will take all possible measures to satisfy your request within a reasonable period of time and no later than within (1) month from the identification of your submitted request, informing you in writing of the satisfaction of your request, or the reasons that may prevent the exercise of the relevant right; or the satisfaction of one or more of your rights, in accordance with the General Data Protection Regulation. Please note that in some cases it may not be possible to satisfy your relevant requests, such as when the satisfaction of the right is contrary to a legal obligation or conflicts with a contractual legal basis for processing your data.

If, however, you believe that any of your rights or legal obligations of our Organisation regarding the protection of Personal Data are being violated and after you have previously contacted the Organisation's Data Protection Officer (DPO) for the relevant matter, i.e. you have exercised your rights to the Organisation and either you have not received a response within one month (extending the deadline to two months in case of a complex request); whether you consider that the response you received from the Agency is not satisfactory and your issue has not been resolved, you may lodge a complaint with the competent supervisory authority, i.e., the Office of the Commissioner for Personal Data Protection, 15 Kypranoros Street, 1061 Nicosia, Cyprus, Tel: +357 22818456, Fax: +357 22304565,

Email: **commissioner@dataprotection.gov.cy**

4.13 How is my personal data protected?

We have taken appropriate Organisational and technical measures to protect your personal data from misuse, interference, loss, unauthorized access, modification or disclosure. The measures we use include implementing appropriate measures in access control, technical information security as well as ensuring that personal data is encrypted, pseudonymized and anonymized, where necessary and feasible.

Access to your personal data is allowed only to our competent employees and partners and only if it is necessary to support the activity of our Organisation, and is subject to strict contractual confidentiality obligations, when processing is commissioned and carried out by third parties.

4.14 How can I contact the Organisation?

You can contact us at our registered office address as

Data Controller:

Name: Pafos District Local Government Organisation

Address: 11 Charalambou Mouskou Street, Korytsa Corner, P.C: 8010

P.O Box: 60474, 8103 Pafos

Phone: 26818202

Email: Contact

4.15 Update – Update of this Privacy Policy Statement

This statement will be revised as necessary to adapt to legislative changes, to respond to the comments and needs of data subjects, and changes in our Organisation's products, services, and internal processes. Any changes will be posted with a simultaneous revision of the date last updated at the top of this statement – Privacy Policy.