



GDPR Manual – Privacy Notice

Approved by:

Director - Data Protection Officer

The information contained in this manual is the property of EMA Mechanical Contractors Ltd. It must not be used for commercial or other purposes without prior approval of the Management of the Company.

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1. Introduction

Information given by EMA Mechanical Contractors Ltd to the subject of personal data, in accordance with the provisions of Processing of Personal Data (Protection of the Individual) Law 2001 and the General Data Protection Regulation 2016.

In accordance to the provisions of the Cyprus Processing of Personal Data (Protection of the Individual) Law 2001, (the “Law”), and the General Data Protection Regulation 2016 (“GDPR”) ,Hawaii Hotels Limited, as the Controller of Processing, hereby informs you that it has the obligation to secure that your personal data, (that is information which refers to you), which has come or may come into its custody, which also contains sensitive data (as this term is defined by the Law), is processed in accordance with the Law and the GDPR.

The records, either electronic or not, which will contain your personal data, will be under the control of the Controller of Processing. The Controller of Processing is EMA Mechanical Contractors Ltd with address and telephone number Angyras 65A, 3042 Limassol Cyprus, Telephone No 25 373383

2. What information we process?

Personal information is any information about you as an identifiable individual. The personal information that we process includes:

- Basic information – such as name, surname, date of birth, gender, passport and/or ID information and publicly available photograph;
- Contact information – such as your home address, zip/postal code, email address and phone number;
- Personal information about the family status;
- Personal information about the hygiene routine;
- Financial information –itemized spending and transaction history;
- Health information where disclosed and relevant to the provision of services;
- Preferences – such as special requests, service issues and other preferences;
- Technical information – such as information about the device you use to interact with us (including the unique device identifier, IP, hardware model, operating system and version, and mobile network information, in the case of our website); and
- Correspondence – when you contact us, such as to send an enquiry or ask for a quotation or the documents for an offer or make a request, any correspondence or application may be kept and added to your personal information.

3. How do we use your personal information?

We use your personal information for the following purposes:

- to enable you to use our website;
- to help us identify you and any accounts you hold with us;
- to provide superior customer service to you;
- to assist us in making your installation and providing the services you request;
- to process transactions through our website and to assist in any inquiries about your transaction;
- for billing purposes in relation to the services provided to you;
- to confirm transactions/ services statements or invoices;
- to contact you in relation to matters that arise from your requests;
- to send you newsletters regarding our services and to advise you of promotions or to inform you of offers or other information that may be of interest to you (if, where required, you separately provide your consent for us to do so);
- to conduct surveys (if, where required, you separately provide your consent to this);

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- to respond to a specific "Information Request" from you and deal with any other enquiries, correspondence, concerns or complaints you have raised; and
- to operate our business, including for internal purposes such as auditing, data analysis, statistical and research purposes and troubleshooting to help us improve our services.

4. On what basis do we use your personal information?

We use your personal information on the following basis:

- to comply with legal and regulatory obligations, including financial reporting requirements imposed by government regulators and our auditors;
- to enter into agreements with you, and to provide maintenance services;
- to provide you the services requested;
- for legitimate business purposes – using your personal information helps us to operate and improve our business and minimize any disruption to the services that we may offer to you. It also allows us to make our communications with you more relevant and personalized to you, and to provide you the services requested more efficient and effective;
- because you have given your consent – at times we may ask for your consent to allow us to use your personal information for one or more purposes.
- for the establishment, exercise or defense of legal claims or proceedings.

5. How is personal information collected?

We collect your personal information while monitoring our technology tools and services, including comment cards and email communications sent to and from EMA Mechanical Contractors Ltd.

Otherwise, we gather information when you provide it to us, or interact with us directly, for example:

- when you send us a message to the social media pages such as Facebook;
- when you send us an e-mail or enquiry or request through our website or to our company;
- when you send us an e-mail or enquiry or request through the i-Mech website;
- when you make a service agreement with our company;
- when you give us your personal information when requesting an offer or you making a request for a service that we provide; and
- when we sign between us a service agreement.

We also receive information about you from other sources, such as our business partners, architects, consultants and publicly available sources. We combine information that we have about you from various sources, including the information that you have provided to us.

We may also collect information from you through the use of cookies, when you visit our website.

6. What personal information may be provided to third parties?

We may share certain of your personal information with:

- consultants, contractors, business partners or third party service providers of EMA Mechanical Contractors Ltd who provide services to us for better serve your needs as a client;
- Analytics and search engine providers that assist EMA Mechanical Contractors Ltd in the improvement and optimization of our website;
- our professional advisors and auditors; and
- local or foreign regulators, governments, courts, law enforcement and national security authorities.

You may advise the company if you do not want personal preferences shared.

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Where a third party is engaged by EMA Mechanical Contractors Ltd to provide services on our behalf, we ensure these parties protect your Personal Information in a manner consistent with the principles articulated in this Privacy Notice.

If you have chosen to join a subscription list, please note that they are only used for internal purposes and we do not sell or rent our subscription lists to anyone.

If EMA Mechanical Contractors Ltd suspects any unlawful activity is taking place, it may investigate and/or report its findings or suspicions to the police or other relevant law enforcement agency.

7. How do we protect personal information?

We use a variety of security measures and technologies to help protect your personal information from unauthorized access, use, disclosure, alteration or destruction, consistent with applicable data protection and privacy laws. For example, we allow only encrypted communications from all of our web forms, including when you send us an e-mail through our website. We also use the office 365 that is keeping everything encrypted in the Microsoft exchange server.

EMA Mechanical Contractors Ltd stores personal information in a secure location and we take steps to ensure that only designated individuals have access to this information.

8. Your rights

Accessing your personal information

We understand that you may like to know what personal information we hold about you. We are happy to assist you with your request. To protect your personal information, however, we require that you prove your identity to us at the time your request is made.

When you make a request in person, we will require you to sign a request form.

Where you make a request by other means, we request you contact us in writing via email, fax or letter.

The above information is required to create an audit trail of how the request has been handled.

EMA Mechanical Contractors Ltd reserves the right to decline access to your personal information under certain circumstances as permitted by law. If your personal information is not disclosed to you, you will be provided with the reasons for this non-disclosure.

You may also be entitled to:

- request the correction and/or deletion of your personal information;
- request the restriction of the processing of your personal information, or object to that processing;
- opt out from processing of your personal information for direct marketing purposes;
- withdraw your consent to the processing of your personal information (where EMA Mechanical Contractors Ltd is processing your personal information based on your consent)

If you do not wish to receive marketing information from EMA Mechanical Contractors Ltd, you may indicate your wishes by sending us an e-mail to: ema@co-cy.com

You will always have the ability to accept or decline any form of communication from EMA Mechanical Contractors Ltd.

You may unsubscribe from electronic marketing communications at any time by selecting the “unsubscribe” link included in such communications.

If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations.

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After you have chosen to withdraw your consent EMA Mechanical Contractors Ltd may be able to continue to process your personal information to the extent required or otherwise permitted by law.

9. How Long we will keep your Personal Data?

We will keep your personal Data for as long as you are Client or Supplier. If you choose to stop being a Client or Supplier, we may keep your Personal Data for a period of up to 7 years. If we do so, we will ensure that your personal data are secured and used only as listed in Point 4 & 5.

10.Contact US

If you have any questions or concerns regarding this Privacy Notice, please contact our Chief Data Protection Officer by writing to the following address:

Data Protection Officer:

EMA Mechanical Contractors Ltd

Angyras 65A, 3042 Limassol Cyprus
P.O Box: 51677, T.k. 3507 Limassol Cyprus

E-mail: ema@co-cy.com

11.Changes to This Privacy Notice

Our Privacy Notice may change from time to time and we will post the revised policy on our website so you will be always aware of how we process your Personal Data.

Last Updated: [25.05.2018]