

CYPRUS PRODUCTIVITY CENTER **MEDITERRANEAN INSTITUTE OF MANAGEMENT**

Privacy Policy

Our Privacy Policy is committed to safeguarding your privacy. **Please Contact us** if you have any questions or problems regarding the use of your Personal Data.

By attending our training programmes / using our services, you consent to the processing of your personal data as described in this Privacy Policy.

Contents

1. Definitions used in this Policy
2. Data protection principles we adhere to
3. Your rights regarding your Personal Data
4. What personal data we gather about you
5. How we use your personal data
6. Who else has access to your personal data
7. How we secure your data
8. Children
9. Contact information

1. Definitions used in this Policy

Personal data – any information relating to an identified or identifiable natural person.

Processing – any operation or set of operations which is performed on Personal Data or on sets of personal data.

Data subject – any natural person whose personal data is being processed.

Child – a natural person under 18 years of age.

We/us the Cyprus Productivity Centre and/or the Mediterranean Institute of Management

2. Data Protection Principles we adhere to

We are committed to the following data protection principles:

- Processing is lawful, fair and transparent. All processing activities have legal grounds. Subjects' rights are always taken into consideration prior to any processing of personal data. Upon request, any subject will be furnished with information regarding processing of their personal data.
- Processing is limited to the purpose. Any processing activities should fit the purpose for which the personal data was gathered.
- Only the absolutely minimum (necessary for the purpose) gathering and processing of personal data is performed.
- Processing is limited to a time period. Personal data will not be kept for longer than needed.
- Personal data is gathered and processed with the maximum possible accuracy, integrity and confidentiality.

3. Your rights regarding your personal data

You, as a data subject, have the following rights:

1. Right to information – meaning you have the right to know whether your personal data is being processed; what data is gathered, where it is obtained from and why and by whom it is processed.
2. Right to access – meaning you have the right to access the data collected from/about you. This includes your right to request and obtain a copy of your personal data gathered.
3. Right to rectification – meaning you have the right to request rectification of inaccurate or incomplete, personal data.
4. Right to erasure – meaning that, in certain circumstances, you can request for your personal data to be erased from records.
5. Right to restrict processing – meaning that, in certain circumstances, you have the right to restrict the processing of your personal data.

6. Right to object to processing – meaning that, in certain circumstances, you have the right to object to any processing of your personal data.
7. Right to object to automated processing – meaning you have the right to object to automated processing, including profiling; and not to be subject to a decision based solely on automated processing. You can exercise this right whenever there is an outcome of the profiling that produces legal effects concerning or significantly affecting you.
8. Right to data portability – meaning you have the right to obtain your Personal Data in a machine-readable format or if it is feasible, as a direct transfer from one Processor to another.
9. Right to lodge a complaint – in the event that any request of yours, under the Rights of Access, is refused, or not handled to your satisfaction, you are entitled to justification as to why. If you are not satisfied with the way your request has been handled, please [contact us](#).
10. Right for the support from the **supervisory authority** – meaning you have the right to request the assistance of a supervisory authority and the right for other legal remedies such as claiming damages.
11. Right to withdraw consent – you have the right to withdraw any given consent for processing of your personal data.

4. What personal data we gather about you

We only gather information that you have provided us with. This might be your e-mail address, name, phone number etc. – mainly information that is necessary for delivering you training/a service, or information and promotional material.

5. How we use your personal data

We use your personal data to:

- Inform you about our training programmes / services. This includes, for example, providing you with promotional material and communicating and interacting with you in relation to these training programmes and/or services; notifying you of changes to any training programmes and/or services provided.
- Fulfil any obligation under law or contract.

We use your personal data on legal grounds and/or with your Consent.

On the grounds of entering into a contract or fulfilling contractual obligations, we Process your Personal Data for the following purposes:

- to identify you
- to offer you a training programme or provide you with a service
- to communicate for either promotional purpose or invoicing.

On the ground of legitimate interest, we process your personal data for the following purposes:

- to send you personalized information
- to administer and analyse our customer Data Base, in order to improve the quality, variety, and availability of training programmes / services offered/provided
- to conduct questionnaires concerning customer satisfaction.

With your consent we process your personal data to send you newsletters and promotional material.

We process your personal data in order to fulfil the obligations arising from the new GDPR legal framework and/or use your personal data for options provided by the law. We reserve the right to anonymise Personal Data gathered and to use any such data. We will use data outside the scope of this Policy only when it is anonymised. We store your information for as long as needed for accounting purposes or other obligations deriving from the law.

We might process your personal data for additional purposes that are not mentioned here, but are compatible with the original purpose for which the data was gathered. To do this, we will ensure that:

- the link between purposes, context and nature of personal data is suitable for further processing
- the further processing will not harm your interests and
- there will be appropriate safeguard for processing.
- We will inform you of any further processing and purposes.

6. Who else can access your personal data

We do not share your personal data with third parties.

We disclose your personal data to third parties or public officials only when we are legally obligated to do so. We might disclose your Personal Data to third parties if you have a priory consented to it or if there are legal grounds for this.

7. How we secure your data

We do our best to keep your personal data safe. We use safety protocols for communicating and transferring data. We use anonymising and pseudonymising where suitable. We monitor our systems for possible vulnerabilities and attacks.

Even though we try our best, we cannot guarantee the security of information. However, we are committed to notifying the relevant authorities of any data breaches that come to our attention. We will also notify you if there is a threat to your rights or interests. We will do everything we reasonably can to prevent security breaches and to assist authorities should any breaches occur.

If you have an account with us, please be advised that you have to keep your username and password secret.

8. Children

We comply with GDPR-K in the case of collection of personal information from children.

9. Contact Information

For any further questions and / or queries regarding our Privacy Policy you can contact us at kepa.contacts@kepa.mlsi.gov.cy.