

PRIVACY POLICY

SCOPE

This Policy applies to all external parties, namely, visitors to Spice&Easy Cyprus websites and social media pages, subscribers to Spice&Easy Cyprus briefings and marketing materials, and any other individual whose personal information may be collected, stored and used by Spice&Easy Cyprus or its partners. This Policy also applies to Spice&Easy Cyprus's management of personal information across its offices.

POLICY

Spice&Easy Cyprus understands that the right of individuals to their privacy is important, and demonstrates this by complying with European Law and standards.

HOW SPICE&EASY CYPRUS COLLECTS PERSONAL INFORMATION

Spice&Easy Cyprus collects personal information only by lawful and fair means, where it is reasonably necessary for or directly related to Spice&Easy Cyprus functions under European law. It is Spice&Easy Cyprus's usual practice to collect personal information directly from you when you deal with Spice&Easy Cyprus by phone, letter, email, face-to-face or online, including when you:

- Make an enquiry with Spice&Easy Cyprus.
- Register an account on a Spice&Easy Cyprus website.
- Subscribe to a newsletter or register to receive brochures (e.g. through a Spice&Easy Cyprus website);
- Apply to attend or exhibit at a Spice&Easy Cyprus event.
- Enter a promotion or competition, including at a Spice&Easy Cyprus event or through the Spice&Easy Cyprus website;
- Have business dealings with Spice&Easy Cyprus (whether as job applicant, as an employee of one of Spice&Easy Cyprus's external service providers, if you work for a government agency Spice&Easy Cyprus deals with, in the context of a transaction, or if you volunteer personal information to Spice&Easy Cyprus).

Where it is practicable, you may choose to remain anonymous or adopt a pseudonym when dealing with Spice&Easy Cyprus.

PERSONAL INFORMATION THAT SPICE&EASY CYPRUS COLLECTS

The types of personal information that Spice&Easy Cyprus collects will depend on the nature of your dealings with its products and services and may include your name, contact details, photographic information, your views and opinions about Spice&Easy Cyprus services, travel information. In particular:

If you deal with Spice&Easy Cyprus in the course of business, Spice&Easy Cyprus will generally collect only your business contact details (so Spice&Easy Cyprus can communicate with you for normal business purposes).

Spice&Easy Cyprus also collects personal information about its employees (including job applicants) and contractors (personnel records).

If you make a complaint, Spice&Easy Cyprus will generally collect your name, address or email address and details about the complaint.

HOW SPICE&EASY CYPRUS USES AND DISCLOSES PERSONAL INFORMATION

Spice&Easy Cyprus will only use and disclose personal information for the purpose for which it was collected, or otherwise in accordance with the European Privacy Act. For example, if you contact the Spice&Easy Cyprus offices requesting information about travelling to Cyprus, Spice&Easy Cyprus will use your name and email address to send you this information. Other examples include use or disclosure for the purpose of:

Providing you with the publications or services you have requested.

- Marketing communications.
- Complaint handling.
- Research and forecasting.
- Employment purposes.

Spice&Easy Cyprus will not use or disclose personal information for a purpose other than that for which it was collected unless:

- Your consent is obtained.
- Spice&Easy Cyprus is required to, or authorised by European law or a court or tribunal order;
- Otherwise in accordance with the Privacy Act.

Spice&Easy Cyprus may also use or disclose your personal information for a secondary purpose related to, or directly related to, the purpose of collection where you would reasonably expect that your information would be used for this other purpose. These secondary purposes may include activities such as public education or quality assurance.

At or before the time Spice&Easy Cyprus collects your personal information (or as soon as practical afterwards), Spice&Easy Cyprus will take such steps as are reasonable in the circumstances to provide you with a collection notice containing the following information setting out, among other things, the purpose of collection.

ACCESS AND CORRECTION

Under the Privacy Act, you have the right to seek access to the records of personal information that Spice&Easy Cyprus holds about you. You also have the right to ask Spice&Easy Cyprus to alter your personal information if you think the information is inaccurate, out-of-date, incomplete, irrelevant or misleading.

If you wish to access or correct your personal information that Spice&Easy Cyprus holds, please submit a written request setting out what information you wish to access or correct, your name and a mailing/email address to Spice&Easy Cyprus. Spice&Easy Cyprus may require you to verify your identity. Spice&Easy Cyprus will respond to your request within 30 days.

If Spice&Easy Cyprus refuses to provide you with access to your personal information or to correct that information as you request, it will provide you with reasons for that refusal and information about how to make a complaint.

If Spice&Easy Cyprus refuses to correct your personal information, IT will take reasonable steps to associate a statement with your personal information that you consider the information to be inaccurate.

ONLINE PRIVACY ISSUES

If you use the Spice&Easy Cyprus website, information is recorded about your visit for web personalization, research and statistical and reporting purposes as well as to allow Spice&Easy Cyprus to improve its website, products and services.

Spice&Easy Cyprus also uses cookies and session tools to improve your experience when visiting its sites. The information collected may include your IP address, the referring site and the pages visited on the Spice&Easy Cyprus website. IP addresses are logged to track a user's session while the user remains anonymous. Spice&Easy Cyprus analyses this data for certain trends and statistics, such as which parts of Spice&Easy Cyprus's websites users are visiting and how long they spend there. Spice&Easy Cyprus does not link your IP addresses to anything that identifies you.

In general, you can visit the Spice&Easy Cyprus website without telling Spice&Easy Cyprus who you are or revealing any personal information about yourself. However, there are times when Spice&Easy Cyprus may need to collect your personal information. For instance, if you register to receive Spice&Easy Cyprus publications or to attend an event, Spice&Easy Cyprus will need to collect some personal information from you for this purpose. In this case, Spice&Easy Cyprus will provide notice and seek your permission to send you further electronic communications, and for your personal information to be stored in its databases. If at any time after submitting your personal information to Spice&Easy Cyprus you would no longer like to receive information, simply follow the "unsubscribe" directions at the end of any email communications you receive, or contact Spice&Easy Cyprus using the contact details listed at the end of this Policy.

No attempt will be made by Spice&Easy Cyprus to identify website users or their browsing activities except in the unlikely event of an investigation where a law enforcement agency may exercise a warrant to inspect server logs. The statistics and log files may be preserved indefinitely and used at any time and in any way necessary to prevent security breaches and to ensure the integrity of the information supplied by Spice&Easy Cyprus.

Where you use Spice&Easy Cyprus social media pages (such as Facebook or Twitter) Spice&Easy Cyprus will not collect any personal information about you without your consent.

Cookies

Some Spice&Easy Cyprus webpages use cookies which are small files that may be placed on your hard disk for recordkeeping purposes. A cookie helps Spice&Easy Cyprus remember who you are and can make your subsequent visits to the webpage simpler and more seamless. You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether or not to accept it. However, by not accepting cookies, some webpages may not display properly, or you may not be permitted to access certain information. No personal information is stored within Spice&Easy Cyprus cookies. Cookies are important for Spice&Easy Cyprus websites and are used to provide the best possible online experience. By continuing to use this site you are consenting to their use.

Online security

Spice&Easy Cyprus strives to ensure the security, integrity and privacy of personal information submitted to its websites, and periodically updates its security measures in light of current technologies. You need to be aware of inherent risks associated with the transmission of information via the Internet. Spice&Easy Cyprus cannot guarantee or warrant the security of any personal information you submit to its websites. If you have concerns in this regard, Spice&Easy Cyprus has other ways of obtaining and providing information. Postal services, phone and fax facilities are available.

The Spice&Easy Cyprus website may also be linked to websites operated by third parties. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship, endorsement, or approval of these websites. Visitors to those websites should refer to their separate privacy policies and practices, e.g. Google Analytics and Adobe packages.

Complaints

If you wish to complain about how Spice&Easy Cyprus manages personal information, you should submit a written complaint by post or email using the contact details set out in this policy. Spice&Easy Cyprus will endeavour to respond to your complaint within 30 days.

CONTACT INFORMATION

If you have any questions about this Policy or if you wish to make a complaint, contact Spice&Easy Cyprus using the following contact details:

- By email: info@spiceandeasycyprus.com
- By post: 7 Savva Georgiou, Peristerona, Paphos 8810, Cyprus
- By phone: +357 9910422

Spice&Easy Cyprus periodically reviews this Policy and reserves the right at its discretion to modify or remove portions at any time. Any amendments will be notified by posting an updated version on its website.

Last reviewed: Tuesday, 19 May 2020