

## **COOKIES & PRIVACY POLICY**

**RPCO SOLUTIONS LTD**, a Company registered in Cyprus with registration number HE 474441 and registered address at Riga Feraiou, 35, FEREOS HOUSE, Office 103, 3095, Limassol, Cyprus (hereinafter referred to as the “**Company**” or “**RPCO SOLUTIONS**”) respects your privacy and is committed to being transparent with our processing of your personal data. We have implemented practices that are designed to protect your privacy, employing appropriate security measures and controls to minimize and mitigate any unauthorized access, disclosure, destruction or alternation of your personal data.

### **Our Commitment to you**

In order for us to provide you with our service, we are required to collect and process certain personal data about you and your activity. By entrusting us with your personal data, we would like to assure you of our commitment to keeping such information private. We have taken measurable steps to protect the confidentiality, security and integrity of this data. We encourage you to review the following privacy policy statement carefully.

### **Grounds for Data Collection**

Processing your personal information (meaning, any data which leads to your identification with reasonable means; hereinafter “**Personal Information**”) is necessary for the performance of our contractual obligations towards you and providing you with our services, to protect our legitimate interests. When you use our services, you consent to the collection, storage, use, disclosure and other uses of your Personal Information as described in this Privacy Policy Statement.

### **How we Receive this Information and What Type of Data we Collect?**

In order to provide you with our services we will need to collect the following information:

#### **(1) Personal Information:**

- Name, address and contact details
- Occupation
- Date of Birth
- Bank account details for deposits held, filing fees and payment of accounts
- Details of the services provided to you by RPCO SOLUTIONS

#### **(2) Non-Personal Information:**

We record and collect data from or about your device (for example your computer or your mobile device) when you visit our site. If we combine Personal Information with non-Personal Information about you, the combined information will be treated as Personal Information for as long as it remains combined.

### **(3) Tracking Technologies:**

When you visit or access our services we use (and authorize 3rd parties to use) pixels, cookies, events and other technologies ("Tracking Technologies"). These allow us to automatically collect information about you, your device and your online behavior, in order to enhance your navigation in our services, improve our site's performance, perform analytics and customize your experience on it. In addition, we may merge information we have with information collected through said tracking technologies with information we may obtain from other sources and, as a result, such information may become Personal Information.

#### **How do we Use the Information we Collect?**

##### **a) Provision of service**

We will use the Personal Information you provide us for the provision and improvement of our services to you.

##### **b) Marketing purposes**

We will use your Personal Information (such as your email address or phone number). For example, by subscribing to our newsletter you will receive tips and announcements straight to your email account. We may also send you promotional material concerning our services or our partners' services (which we believe may interest you), including but not limited to, by building an automated profile based on your Personal Information, for marketing purposes. You may choose not to receive our promotional or marketing emails (all or any part thereof) by clicking on the "unsubscribe" link in the emails that you receive from us. Please note that even if you unsubscribe from our newsletter, we may continue to send you service-related updates and notifications or reply to your queries and feedback you provide us.

##### **c) Opt-out of receiving marketing materials**

If you do not want us to use or share your personal information for marketing purposes, you may opt-out in accordance with this "Opt-out" section. Please note that even if you opt-out, we may still use and share your personal information with third parties for non-marketing

purposes (for example to fulfil your requests, communicate with you and respond to your inquiries, etc.). In such cases, the third-parties with whom we share your personal information are authorized to use your Personal Information only as necessary to provide these non-marketing services.

d) Analytics, surveys and research

We are always trying to improve our services and think of new and exciting features for our users. From time to time, we may conduct surveys or test features, and analyze the information we have to develop, evaluate and improve these features.

e) Protecting our interests

We use your Personal Information when we believe it's necessary in order to take precautions against liabilities, investigate and defend ourselves against any third-party claims or allegations, investigate and protect ourselves from fraud, protect the security or integrity of our services and protect the rights and property of **RPCO SOLUTIONS** its users and/or partners.

f) Enforcing policies

We use your Personal Information to enforce our policies, including but limited to our Terms within our Engagement.

g) Compliance with legal and regulatory requirements

We also use your Personal Information to investigate any potential violations and prevent money laundering and perform due diligence checks, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process.

**With Whom do we Share Your Personal Information?**

From time to time, we may need to disclose some of your Personal Information to the following parties (including individuals and corporate organizations) :

- Internal concerned parties: We share your information with our employees, limited to those employees or partners who need to know the information in order to provide you with our services.
- Business partners: We share your information with business partners, such as storage providers and analytics providers who help us provide you with our services.

- Merger and acquisitions: We may share your information if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets. Any party that acquires our assets as part of such a transaction may continue to use your information in accordance with the terms of this Privacy Policy.
- Your agents, including legal advisors and administrators.
- Regulatory bodies, government agencies, law enforcement agencies and courts.
- Other parties we are required by law to disclose such personal information.

### Cookie Disclosure

Cookies are small text files that are placed on your computer by websites that you visit.

They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. **RPCO SOLUTIONS** uses cookies to personalize content and ads, to provide social media features and to analyze our traffic. **RPCO SOLUTIONS** also shares information about your use of our site with our social media, advertising and analytics partners who may combine it with other information that you've provided to them or that they've collected from your use of their services.

The table below explains the cookies we use and why:

| Name | Expiry  | Purpose Description                                                                                                             |
|------|---------|---------------------------------------------------------------------------------------------------------------------------------|
| _ga  | 2 years | Used by Google Universal Analytics to distinguish unique users by assigning a randomly generated number as a client identifier. |
| _gat | 1 day   | Used by Google Universal Analytics to throttle request rate.                                                                    |
| _gid | 1 day   | Used by Google Universal Analytics to store and update a unique value for each page visited.                                    |

| <b>Name</b>         | <b>Expiry</b> | <b>Purpose Description</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------------|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| _pk_id              | 1 year        | Used by Matomo Analytics Platform to help us track visitor behavior and measure site performance                                                                                                                                                                                                                                                                                                                                                                                        |
| _pk_ses             | 1 day         | Used by Matomo Analytics Platform to track page requests from the visitor during the session.                                                                                                                                                                                                                                                                                                                                                                                           |
| _fbp                | 3 months      | Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.                                                                                                                                                                                                                                                                                                                                                                  |
| freshworks-s360-vid | 1 year        | Website Live Chat Software by Freshworks                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| CPSession-ID        | 1 day         | These cookies keep track of non-personally identifiable information about users of the my.nbhm.eu site, including: browser used to access the site, date and time, the URL of the page being loaded, users who have visited a particular website(s), any previously assigned cookie identification (a unique identifier assigned to a user to identify repeat visitors), browser window size, the geographic location of the user, device and operating system used to access the Site. |

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit [allaboutcookies.org](http://allaboutcookies.org).

Find out [How to Manage Cookies on Popular Browsers](#)

- Google Chrome
- Microsoft Edge
- Mozilla Firefox
- Microsoft Internet Explorer
- Opera
- Apple Safari

### **How we Protect Your Information**

We have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your personal information. Your information is stored on secure servers and isn't publicly available. We limit access of your information only to those employees or partners that need to know the information in order to enable the carrying out of the agreement between us.

You need to help us prevent unauthorized access to your account by protecting your password appropriately and limiting access to your account (for example, by signing off after you have finished accessing your account). You will be solely responsible for keeping your password confidential and for all use of your password and your account, including any unauthorized use.

While we seek to protect your information to ensure that it is kept confidential, we cannot absolutely guarantee its security. You should be aware that there is always some risk involved in transmitting information over the internet.

### **Retention**

We will retain your personal information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations we are obliged to keep your personal information in our records for at least five (5) years after the termination of our business relationship. The retention period of five (5) years may be extended upon legal and/or regulatory requirements.

## What are your rights?

You have certain rights in respect of the information we hold relating to you:

- **Right to access:** You have the right to request information about the personal data we hold on you, the purposes the data is being processed and obtain a copy of it at any time. Upon request, information must be provided to you without delay and at the latest within one month of receipt. We are able to extend this by a further two months if the request is complex and numerous but will inform you accordingly.
- **Right to portability:** You have the right to obtain and reuse your personal data for your own purposes across different services. Whenever **RPCO SOLUTIONS** processes your personal data by automated means based on your consent or based on an agreement you have the right to get a copy of your data transferred to you or to a nominated party. This only includes the personal data you have submitted to us.
- **Right to rectification:** You have the right to request rectification of your personal data if it is incorrect or incomplete.
- **Right to be forgotten:** You have the right to require us to delete your personal information if our continued use of it is not justified in specific circumstances including: where it is no longer necessary in relation to the purpose for which it was collected/processed, when you withdraw consent, when you object to its processing and there is no overriding legitimate interest for continuing the processing, in order to comply with a legal obligation or if the data was unlawfully processed. There are some specific circumstances where the right to erasure does not apply.
- **Right to restrict processing:** In some circumstances, where you may not be entitled to require us to erase your personal information, you may be entitled to limit the purposes for which we can use your information.
- **Right to withdraw your consent to processing:** You have the right to withdraw the consent you have given us to allow us to process your personal information or to receive any materials from us
- **Right to object to direct marketing:** You have the right to object to direct marketing, including profiling analysis made for direct marketing purposes.

### **How can you exercise your rights?**

In order to exercise these rights, to request a Subject Access Request or if you have any concerns about our use of your personal information, please contact our privacy officer at [info@rpcoslutions.com](mailto:info@rpcoslutions.com)

You can also contact the Office of the Commissioner for Personal Data Protection in which is the supervisory authority in the Republic of Cyprus for the implementation and enforcement of data protection law.

Website: <http://www.dataprotection.gov.cy>

Address: 1 Iasonos str., 1082 Nicosia, P.O.Box 23378, 1682 Nicosia.

Tel: +357 22818456 Fax: +357 22304565

Email: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)

### **How to contact us**

If you decide to terminate our engagement, you may do so by emailing us via email at [contact@rpcoslutions.com](mailto:contact@rpcoslutions.com) Please be aware that Personal Information that you have provided us may still be maintained for legal and regulatory reasons (as described above).

### **Updates to this Privacy Policy Statement**

This Privacy Policy Statement is subject to changes from time to time, at our sole discretion. The most current version will always be posted on our website. You are advised to check for updates regularly. By continuing to access or use our services after any revisions become effective, you agree to be bound by the updated Privacy Policy.