



Dexterity Solutions Limited respects your privacy and is committed to protecting your personal data. This privacy policy (the “**Privacy Policy**”), describes how we collect, use and share your personal data and/or which we otherwise collect in the course of our business, including via our websites <http://www.dexterity.com.cy/home.html> and <https://priority-software.com.cy/> (each the “**Website**”), email communications and any other application, in line with the GDPR.

For any questions or concerns in relation to this Privacy Policy contact us at [info@dexterity.com.cy](mailto:info@dexterity.com.cy) or +357 22 282930.

Our Websites are not directed to children, and so we do not knowingly process personal data relating to children.

This Privacy Policy was last updated in October 2023 and supersedes any earlier version. We may update it from time to time. If we make any significant changes to this Privacy Policy, we will inform you through a notice on our Website.

By using our Websites and/or any of our services, you acknowledge that both we, as well as any of our partners or subcontractors will process your personal data in accordance with this Privacy Policy. If you do not wish to provide your personal data on the basis set out in this Privacy Policy, you should not enter the relevant information on our Websites, or otherwise provide us with your personal data. However, if you do not provide your personal data, you may not be able to use our Services.

### **Third-party links**

Our Websites may contain links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third-parties to collect or share your personal data. Please note that we do not control these third-party websites and are not responsible for their use of your personal data.

## **1. PERSONAL DATA WE MAY COLLECT**

We collect, use, store and transfer your personal data in order for us to provide you with our services. The personal data we collect, and use includes, without limitation:

- Identity Data (which may include, inter alia, name, title, date of birth, gender, I.D. no., passport no., username and password, your interests and preferences, feedback and survey responses, company name, company registration no.)
- Contact Data (billing address, delivery address, email address and telephone numbers)
- Financial Data (bank account and payment details)
- Transaction Data (details about payments to and from you and other services you have purchased through us)
- Technical Data (internet protocol address, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, online identified, location data and other similar identifying information required for the customer’s device(s) to communicate with websites and applications on the internet)
- Usage Data (how you use our Website products and/or other services, the full uniform resource locators clickstream to, through and from our site (including date and time), download errors,

lengths of visit to certain pages, page interaction information, methods to browse away from the page and any phone numbers you use to call us)

- Marketing and Communications Data (your marketing preferences from us and your communication preferences)

The personal data we hold about you must be accurate, up-to-date, complete and non-misleading. Please inform us if your personal data changes during your relationship with us. You can ask us to rectify or update your personal information at any time by email to [info@dexterity.com.cy](mailto:info@dexterity.com.cy).

## 2. HOW IS YOUR PERSONAL DATA COLLECTED

We use different methods to collect data from and about you including through:

### Direct interactions

You may share with us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- receive our services;
- use the contact form in our Website;
- request marketing to be sent to you;
- contact us through email or social media;
- visit our offices or call us; or
- apply to join our team.

## 3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data for the legitimate purposes for which we have collected it or to comply with our legal obligations. If we need to process your personal data for a different purpose that is not compatible with the original purpose that we collected your personal data, we will let you know.

Purpose / Activity	Legal basis for processing	Type of Data required
To contact you	<p>Performance of a contract with you</p> <p>Necessary for our legitimate interests (for running our business, to recover debts due to us, to keep our records updated and to study how customers use our products/services)</p>	<ul style="list-style-type: none"> <li>○ Identity Data</li> <li>○ Contact Data</li> <li>○ Financial Data</li> <li>○ Transaction Data</li> <li>○ Marketing and Communications Data</li> </ul>
To carry out our obligations arising from any contracts entered into between you and us and to provide you the information, products and services you request from us	<p>Performance of a contract with you</p> <p>Necessary for our legitimate interests (for running our business and to recover debts due to us)</p>	<ul style="list-style-type: none"> <li>○ Identity Data</li> <li>○ Contact Data</li> <li>○ Financial Data</li> <li>○ Transaction Data</li> <li>○ Marketing and Communications Data</li> </ul>

To provide you with information about other goods and services that we offer which we feel may be of interest you	Necessary for our legitimate interests (to develop our products/services and grow our business)	<ul style="list-style-type: none"> <li>○ Identity Data</li> <li>○ Contact Data</li> <li>○ Technical Data</li> <li>○ Usage Data</li> </ul>
To assist us in the improvement and optimisation of advertising, marketing material and content, our services and the Websites	Necessary for our legitimate interests (to develop our products/services and grow our business and provision of administration and IT services)	<ul style="list-style-type: none"> <li>○ Identity Data</li> <li>○ Contact Data</li> <li>○ Financial Data</li> <li>○ Transaction Data</li> <li>○ Marketing and Communications Data</li> </ul>
To notify you about changes to our service	<p>Performance of a contract with you</p> <p>Necessary to comply with our legal obligations</p> <p>Necessary for our legitimate interests (to keep our records updated)</p>	<ul style="list-style-type: none"> <li>○ Identity Data</li> <li>○ Contact Data</li> </ul>
To ensure that content from our Websites is presented in the most effective manner for you and your computer	Necessary for our legitimate interests (to develop our products/services and grow our business and provision of administration and IT services)	<ul style="list-style-type: none"> <li>○ Identity Data</li> <li>○ Contact Data</li> <li>○ Financial Data</li> <li>○ Transaction Data</li> </ul>
To verify your identity	<p>Necessary to comply with our legal obligations</p> <p>Necessary for our legitimate interests (for running our business and to prevent fraud and money laundering)</p>	<ul style="list-style-type: none"> <li>○ Identity Data</li> <li>○ Contact Data</li> <li>○ Financial Data</li> <li>○ Transaction Data</li> </ul>
As part of our efforts to keep our site safe and secure and to prevent or detect fraud	<p>Necessary to comply with our legal obligations</p> <p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p>	<ul style="list-style-type: none"> <li>○ Identity Data</li> <li>○ Contact Data</li> <li>○ Financial Data</li> <li>○ Transaction Data</li> </ul>
To provide customer support	Performance of a contract with you	<ul style="list-style-type: none"> <li>○ Identity Data</li> <li>○ Contact Data</li> </ul>
To comply with the requirements imposed by law or any court order	Necessary to comply with our legal obligations	<ul style="list-style-type: none"> <li>○ Identity Data</li> <li>○ Contact Data</li> <li>○ Technical Data</li> <li>○ Usage Data</li> </ul>

## **Marketing**

You have the right to withdraw your consent for us to use your personal data for marketing purposes at any time. If you do withdraw your consent, we will stop marketing our goods and services to you.

To withdraw your consent for marketing purposes, you can do so at any time by:

- Following the opt-out links on any marketing message sent to you, or
- Contacting us at +357 22 282930.

Should you withdraw your consent to receiving marketing messages, we will still process your personal data in order to fulfil our contract with you and to comply with our legal, accountancy and regulatory obligations.

## **4. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with certain third parties for the purposes set out in paragraph 3 of this Privacy Policy. Should we do so, we will ensure that we have agreements in place that restrict these parties' use of your personal data. We will only allow them to use your personal data for specified purposes and in accordance with our instructions. Such third parties include the following:

- service providers acting as processors based in the EU/EEA who provide IT and system administration services, tenancy deposit administrators and services to enable us to perform our contract with you;
- professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in Cyprus who provide consultancy, banking, legal, insurance and accountancy services; and
- government entities, regulators and other authorities acting as processors or joint controllers based in Cyprus who require reporting of processing activities in certain circumstances.

## **5. DATA SECURITY**

Once we have received your personal data, we will use reasonable and necessary procedures and security features to try and prevent unauthorised access. We limit access to your personal data to the parties who need to know it and who are subject to a duty of confidentiality. If we become aware of a data breach, we will notify the Office of the Commissioner for Personal Data Protection. If we believe that the data breach is serious, we may notify you in accordance with our legal requirements. We have an internal data breach policy in place that lays out our responsibilities and procedures.

## **6. INTERNATIONAL TRANSFERS**

We will not transfer your personal data outside of the European Economic Area, except to a country offering the same level of protection for your personal data, and only according to GDPR requirements.

## 7. DATA RETENTION

We retain your personal data whilst you use our services (or whilst we provide services connected to you) and for at least seven (7) years thereafter, for legal, regulatory and accounting purposes. If we need to hold on to your personal data for longer, we take into consideration the potential risks in continuing to store your data against why we might need to keep it. Where it is no longer necessary for us to process your personal data, we will delete it. In some circumstances we might anonymise your personal data so it is not associated with you, which will allow us to use this information indefinitely.

## 8. YOUR LEGAL RIGHTS

Under data protection laws you have the right to protect and look after your personal data.

You have the right to request that we:

- provide information about the personal data that we hold and process about you (this is commonly known as a data subject access request). You have rights to the following information:
  - the purpose(s) for which we are processing your information;
  - the categories of personal information we hold about you;
  - the recipients or categories of recipient to whom the personal data have been or will be disclosed;
  - the period for which we will store your information, or the criteria used to determine that period;
- prevent the use of your personal data for marketing purposes;
  - Please note that even if you refuse marketing, we will contact you to discuss the services you have asked us to provide to you or to tell you about changes to our terms and conditions;
- correct inaccurate information we hold about you;
- delete the personal data we hold about you in certain situations;
- stop using your personal data for certain purposes;
- do not make decisions about you using completely automated means; and/or
- provide you with the personal data we hold about you in a commonly used, machine-readable format.

The rights listed above may not apply in certain circumstances, and so we may not always be able to comply with your request to exercise these rights. We will usually respond to a request from you to exercise your rights without undue delay and in any event within one (1) month of receipt, but it might take longer if your request is particularly complex or if you have made a number of requests. Please be aware that we may need to process your personal data and/or request specific information from you to help us comply with your request. While we will try to accommodate any request you make in respect of your rights, please note that they are not absolute rights. This means that we may have to



refuse your request or may only be able to comply with it in part. You will not usually have to pay a fee to exercise these rights, but we reserve the right to charge a fee if your request is clearly unfounded, repetitive or excessive, alternatively we may refuse to comply with your request.

## **9. COMPLAINTS AND FEEDBACK**

If you would like to exercise any of your rights, ask questions or raise any concerns about how we handle your personal data, please contact us at [info@dexterity.com.cy](mailto:info@dexterity.com.cy). You can also lodge a complaint to the Office of the Commissioner for Personal Data Protection but we would appreciate it if you come to us first to see if we can resolve your concerns before you approach them.

Dexterity Solutions Limited is registered in Cyprus, with company registration number HE 247316, with registered office at 195-197 Limassol Avenue, Dali Industrial Area, Nicosia 2540.

Last Updated 13 October 2023