

Privacy Policy

Here at OCM Digital Media Cyprus ('OCM') we understand that your privacy is important to you and know that you care how your information is used and shared. We respect and value the privacy of all our customers and will only collect and use personal data in ways that are described here and in a way that is consistent with our obligations and your rights under the law. This notice describes our privacy policy. By visiting OCM, you are accepting the practices described in this Privacy Notice.

Information About Us

OCM DIGITAL MEDIA CYPRUS LTD dba ADOPS

Registered in Cyprus under company number HE 416908.

Registered address: OCM Digital Media, 32 Kritis Street, 3087, Limassol, Cyprus

What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

Definitions

WE/Data Controller: OCM Digital Media Cyprus LTD with its seat in Limassol, at 32 Kritis Street, 3087, Limassol, CY, entered into the register in Cyprus under company number HE 416908 and VAT 10416908R

Personal data: any information relating to a natural person identified or identifiable by one or more particular factors specifying his/her physical, physiological, genetic, mental, economic, cultural or social identity, including image, voice recording, contact details, location data, information in communication, information collected through recording devices or any similar technology.

Policy: Personal data processing / Transparency policy.

GDPR: Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

Data subject: every natural person, whose personal data are processed by the Data Controller (for example our customers, individuals using our services, visiting our premises, communicating with us).

What Are Your Rights?

We recognise that you have rights as a 'data subject' and that we have an obligation to uphold these. This privacy notice aims to outline how we maintain these rights. In particular it outlines:

- How we collect and process your information
- Why we do this
- How you can exercise your rights;
- Who to contact in the event you're unhappy with our performance.

Your information rights

Right	Explanation
Right to be informed	This encompasses the obligation for us to be transparent in how we collect and use your personal data.
Right of access	You have the right to access your personal data and supplementary information.
Right to rectification	If the information we hold on you is inaccurate or incomplete, you can request we correct this.
Right to erasure	You can request we delete or remove personal data where there is no compelling reason us to continue processing
Right to restrict processing	You have the right to request we cease processing your data, if: <ul style="list-style-type: none">• You consider it inaccurate or incomplete;• Where you object to processing and we are considering whether we still have a legitimate interest to process it.• Where we don't need the data for the original reason we collected it, but may

	need it to support a legal claim
Right to data portability	Where you have consented to our processing your data, or where the processing is necessary for us to deliver a contract, you can request a copy of that data be provided to a third party in electronic form.
Right to object	You have the right to object to our processing under certain circumstances. For example, you can object to: <ul style="list-style-type: none"> • direct marketing (including profiling); • processing for purposes of scientific/historical research and statistics
Rights relating to automated decision making including profiling	Where we apply automated decision making, we must <ul style="list-style-type: none"> • give you information about the processing; • introduce simple ways for you to request human intervention or challenge a decision; • carry out regular checks to make sure that our systems are working as intended

Information related to automated decision making is contained later in this notice.

This privacy notice should outline how we are transparent in our processing. Please get in touch with us through the 'contact details' section to find out more or to exercise your information rights.

Information We Collect

The personal data we collect from individuals using our Services mostly consists of User data such as name, business function, business address, telephone number, email and other personal data that Users provide to us. This is mostly information in relation to an individual's role at his/her company that does not concern him/her as a private person or as an individual customer. These companies that individuals are working for, mostly are our prospects, customers, suppliers or partners. The specific kind of User data collected will depend on the Services used.

We may collect technical data in relation to Users such as IP address, geographic location, browser type and version, preferred language, operating system and computer platform, the full URL clickstream to, through and from, including date and time, Services that Users viewed or searched for whilst using our websites, websites accessed immediately before and after visiting our websites, and parts of our

websites that Users have visited. Further information regarding our use of cookies can be found in our **Cookies Policy**.

We receive and store certain types of information whenever you interact with our website. For example, like many web sites, we sometimes use 'cookies', and we obtain certain types of information when your web browser accesses our website. Cookies are alphanumeric identifier text files that we transfer to your computer through your web browser to enable our systems to recognise your browser and to provide features such as storage of items in your Shopping Cart between visits (please note that at present we do not offer online shopping through this website).

Why We Collect This Information

We process personal data for the following purposes:

- to enable us to perform the contract we have signed with our customers, suppliers or partners
- to enable contract management e.g. to send our invoices to our customers
- to enable us to run, maintain and develop our business
- to enable us to offer and provide our Services
- to enable customer service management e.g. when Users contact our team
- to enhance our Services and the use thereof
- to perform research and analysis relating to our Services
- to perform tracking of the use of our Services
- to conduct market surveys and/or to detect fraud

In consideration of the collection and processing for the purposes listed above, OCM is supported by its affiliated companies acting as data processors on behalf of and under the responsibility of OCM.

How We Process This

We process personal data to pursue our legitimate interest to run, maintain and develop our business. Furthermore, we process personal data to comply with our legal obligations.

In some parts of our Services, we might request Users' consent for the processing of their personal data for specific purposes. In that event, Users may withdraw their consent at any time.

OCM does not retain user data for longer than is legally permitted or necessary for the related processing purposes. The data held is to support our legal and regulatory requirements. We erase personal data after the legally permitted or necessary storage period or when the User requests us to erase his/her personal data.

Transfer Of Data

OCM and our service providers operate in several locations internationally. Consequently, we and our service providers may transfer personal data to, or access it from, countries outside the User's country of domicile. This is for the purpose of delivering our products and completing our sales process with you. We respect your privacy and appreciate your business. .

Specifically, as a Data Controller (OCM) transfers personal data beyond EEA only, if this is necessary and safeguarding the adequate level of protection, first of all by way of:

- cooperation with entities processing personal data in the countries, in reference to which a respective decision of the European Commission has been issued;
- applying standard contractual clauses laid down by the European Commission;
- applying binding corporate rules approved by the supervisory authority having jurisdiction;

Data Controller (OCM) always communicates the intention of transferring personal data beyond EEA at the stage of collecting data.

Retention Of Data

OCM retains information for no longer than is necessary for the purposes for which it is being processed and for a maximum of seven (7) years in line with legislative and regulatory guidelines. We hold this information to support our legal and regulatory requirements. If you object to this retention, please contact us at dpo@adops.gr.

Conditions of Use, Notices, and Revisions

If you choose to visit our website, your visit and any dispute over privacy is subject to this Notice and our **Conditions of Use**, including limitations on damages, arbitration of disputes, and application of the law of the United Kingdom. If you have any concern about the privacy of your personal information as used and collected within our website, please send us a thorough description by email at dpo@adops.gr, and we will try to resolve it.

Our business changes constantly, and our Privacy Notice and the **Conditions of Use** will change also. We may email periodic reminders of our notices and conditions, unless you have instructed us not to, but you should check our website frequently to see recent changes. Unless stated otherwise, our current Privacy Notice applies to all information that we have about you and your account. However, we will never materially change our policies and practices to make them less protective of customer information collected in the past without the consent of affected customers.

E-mail Communications

To help us make e-mails more productive to improve service, we can send you newsletters of our Services and products; please use the **contact form** if you would like to receive Emails and newsletters regarding our products and Services. We may also send notifications of changes to our policies and order confirmations via Email to existing customers to fulfill our obligations with regards to orders and contracts. If you do not wish to receive emails from us, other than order notifications and receipts, please advise us through the '**Contact**' section of our website.

Use of cookies

Information about our use of cookies can be found in the 'Information We Collect' part of this document and also further information can be found in our **Cookies Policy document**.

Demands and motions with regard to your rights

You can lodge your motion/demand:

- by e-mail at: dpo@adops.gr or gdpr@adops.gr.

In order to make it easier to deal with your demand, please specify clearly, if possible, what your motion/demand concerns, for example:

- what right you would like to exercise (e.g. right to obtain copy data, right to erase data, etc.);
- what processing your demand concerns (e.g. use of a specific service, activity in a specific web service, obtaining a newsletter, etc.);
- what purposes of processing your demand concerns (e.g. marketing purposes, analytical purposes, etc.).

If we are unable to find the content of the demand or to identify who lodges the motion based on the notification, we will ask you for further information. The response to the notification should be given within one month after receiving it. If it is necessary to extend that period, we will inform you of the reasons for extension.

The response is in writing unless the motion/demand has been made by e-mail or communication by e-mail has been demanded in it. In case of doubts as to the identity of someone lodging a demand by email, we reserve the option of identity verification.

Rules of fees

The proceedings in matters of motions being lodged are free of charge. Fees may be collected **only** in the cases of:

- a demand of the second and each next copy data to be given (the first copy data are free of charge); in such an event we may demand payment of the 30 (thirty) EUR fee;

This fee includes costs relating to the dealing with the demand.

- excessive (for example extremely often) or obviously unreasonable demands being made by the same person; in such an event we may demand payment of the 60 (sixty) EUR fee;

This fee includes costs relating to taking steps to deal with the demand.

The data subject, if he/she challenges the decision on imposing the fee, may lodge a complaint to the The Information Commissioner's Office at <https://www.dataprotection.gov.cy/>

Contact details

We recognise that you may have questions on how we process and/or store your data or may want to change either the data we hold on you or how we communicate with you in the future.

If you have given consent for processing, you are free to withdraw that consent. To let us know this is the case please contact us using the information contained in our '**Contact**' section.

If you have any questions in respect of this notice or would like to exercise your rights as a data subject (for example, to correct data or to exercise your right to access), please contact us at: **dpo@adops.gr**

The Data Protection Officer (DPO) can be contacted by Email: **dpo@adops.gr**