

WEBSITE PERSONAL DATA PROTECTION POLICY

1. INTRODUCTION

The General Data Protection Regulation (hereinafter 'GDPR', Regulation (EU) 2016/679) entered into force in the European Union on 25 May 2018. To read the text of the Regulation, please visit the following URL: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R0679>.

This Personal Data Protection Policy (hereinafter the 'Data Policy' or 'PDPP') concerns the Company **CGT Commit Global Translations Ltd**, (Reg. no: HE 345215) with registered address at 14, Sotiri Papalazarou St, Flat 103 Geroskipou 8201 Paphos, Cyprus, Email: info@commit-global.com. The Company is the owner, creator and beneficiary of all rights to this website under the domain name:

- <https://commit-global.com/>

The Company attaches great importance to the protection of the personal data of its customers and executives, including any persons who visit the Company's website. This is why it has prepared this Data Protection Policy in order to notify the foregoing individuals with respect to the manner of collection, use and disclosure of their personal data. The Company has also made available a General Data Protection Policy on its website.

This website may contain links to other websites, which are under the responsibility of third parties (whether natural or legal persons). Additional websites may be added in the future. Under no circumstances shall the Company be liable for the terms of personal data protection and management of those additional websites.

2. DEFINITIONS OF PERSONAL DATA

Note: Under Article 4 of the GDPR:

'Personal Data' means any information relating to an identified or identifiable natural person ('Data Subject').

'Controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data and, in particular, the Company.

'Processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

'Data Subject' means the natural persons whose personal data the controller collects and processes (in this Data Policy, the Data Subjects are the users of the Company's website, (prospective) customers, suppliers, employees and, generally speaking, all interested parties and third parties – visitors to the website).

'Recipient' means a natural or legal person, public authority, agency or another body, to which the personal data is disclosed, whether a third party or not.

3. PERSONAL DATA COLLECTION

When visitors/users visit and

- (i) interact with the Company's website,
- (ii) they fill out model contact webpages (forms),

certain information may be collected automatically, such as:

- **full name, telephone, e-mail address, any data shared by the Data Subjects when filling out the fields of the model contact forms**

Furthermore, the following information can be collected automatically, such as:

- **the user's IP address;** The IP address is determined by the connection provider through which visitors/users access the Internet and, subsequently, the website. The IP address is retained solely for legal reasons.
- **type of browser and operating system;**
- **websites and links clicked on within the webpage;**
- **basic server connection information;**
- **information collected through software such as HTML cookies, Flash cookies, web beacons and other similar technologies.**

4. PURPOSE OF PERSONAL DATA PROCESSING

The personal data collected by the Company are used for purposes concerning:

- (a) the fulfilment of the corporate objective, i.e. the provision of its services;
- (b) the provision of information on the Company services and, in general, its promotion; and
- (c) the generation of statistics relating to the use of this website.

In particular, the Personal Data collected by the Controller's website and stored in the relevant database is intended to be used for the purposes set out above, i.e.:

1. to respond to requests/queries submitted through the model contact forms;
2. to enable the management of the website and any form of communication;
3. to enable the dispatch of newsletters or notifications following a relevant choice by users.

For the purpose under (1) the **legal basis of the processing** is the performance of a contract or the taking of measures at the pre-contractual stage depending on the nature of the request / query submitted.

For the purpose under (2) **legal basis of the processing** is the fulfillment of the legal interests of the Controller consisting in the smooth operation of their website and, in that respect, in the adequacy of their online presence.

For the purpose under (3) **legal basis of the processing** is the consent of the Subject during any data entry. The Company shall ensure that, in this restricted case, the consent granted by the Data Subject meets the conditions set forth in the GDPR and the national legislation on Personal Data Protection.

In line with the General Personal Data Protection Policy of the Company, the data of the users who have contacted the Company shall be kept on the Company's servers for a period of ten (10) years from the date of entry.

5. DATA RECIPIENTS AND PURPOSE OF TRANSFER

The personal data of the users of the Company's website are transferred to the Company associates and/or subcontractors, but always under conditions that fully ensure that the personal data of Data Subjects do not undergo any unlawful processing, i.e. processing other than the purpose of the transfer. The main recipient of users' personal data is:

- (a) The company that has undertaken to provide development and maintenance services for this website, including its hosting services. The company in question shall be the 'Processor' within the meaning of Article 4(f) 8 of the GDPR

6. CONFIDENTIALITY

Competent Company executives have been appointed to access the personal data of website users and are bound to observe secrecy and confidentiality. Unauthorized access is prohibited. Furthermore, the Processors appointed by the Company have agreed and are contractually bound to observe secrecy, to refrain from sending personal data to third parties without the permission of the Company, to take appropriate security measures and to comply with the legislative framework for the protection of personal data.

The Company shall not sell or otherwise transfer or make public the personal data of visitors/users of its website to third parties, excluding the aforementioned recipients, without the visitors'/users' consent, except where legal requirements apply in that respect, and solely to the competent Authorities.

The personal data kept may be disclosed to the competent judicial, police and other administrative Authorities, following a lawful request on their part and in accordance with the applicable legal provisions. Furthermore, in the event of a legal prosecutor's or Service order or official preliminary investigation, the Company has the right to make the relevant data immediately available to the corresponding Service.

The Company shall not transfer personal data of users to any third country or international organization.

The website may offer the ability to share content on Social Networks and other related tools that allow users to share the actions on the Website/Application to other applications, websites or mass media, and vice versa. The use of such features allows the exchange of information with the users' friends or the general public, depending on the settings they have made in their personal profiles. Users/visitors are requested to consult the privacy policies of the social networking services for further information on how they handle their data.

7. TRANSFER AND STORAGE OF PERSONAL DATA

The personal data of Data Subjects are transferred or transmitted through electronic systems; such data are transferred in encrypted format.

Data is stored on the Company servers located on its premises or on servers rented by the Company for the same purpose which are located within the European Union.

8. DATA SUBJECT RIGHTS

As the Controller and in full compliance with the provisions of the GDPR, the Company satisfies and facilitates the exercise of the following rights of the Data Subjects:

8.1. Right of access

The Data Subjects shall have the right to be notified at any time by the Company of whether it processes their personal data and, if so, to request to be informed about the purpose of processing, the type of Data processed, to whom they are transferred, how long they are stored and whether there is automated decision-making. In addition, the Data Subjects shall be granted access to such personal data without undue delay.

8.2. Right to rectification

The Data Subject have the right to obtain from the Company the rectification of inaccurate or outdated personal data concerning him or her. He or she shall also have the right to demand that incomplete personal data be supplemented with a supplementary statement, among other things. Furthermore, the Company shall communicate any rectification of personal data to each recipient to whom the personal data have been disclosed. This obligation shall not apply where the provision of such information proves impossible or would involve a disproportionate effort. The Company shall notify the Data Subject of the recipients in question, upon request.

8.3. Right to erasure

The Data Subject shall have the right to request from the Company the erasure of personal data concerning him or her, if they are no longer necessary in relation to the foregoing processing purposes and under the conditions of Article 17 GDPR.

8.4. Right to restriction of processing

The Data Subject shall have the right to request from the Company restriction of processing of the personal data concerning him or her. Where the processing of personal data has been restricted, such personal data shall, with the exception of storage, be processed solely if specific exceptions apply.

8.5. Right to data portability

The Data Subject shall have the right, under the conditions of Article 20 GDPR to receive the personal data concerning him or her, which he or she has provided to the Company in a structured, commonly used and machine-readable format.

8.6. Right to object

The Data Subject shall have the right to object on grounds relating to his or her particular situation, at any time, to the processing of personal data concerning him or her, under the conditions of Article 21 GDPR. Once the right to object has been exercised, the personal data shall no longer be processed, unless it can be demonstrated that there are compelling, legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defense of legal claims. The Company guarantees that if the Data Subject objects to the processing of data concerning him or her, it shall no longer process such data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject.

8.7. Automated individual decision-making, including profiling

The Company does not make automated individual decisions at this time. In any event, and if in the future the Company decides to proceed with automated individual decision-making, the Data Subject shall have the right to object to a decision based solely on automated processing, including profiling, as that decision produces legal effects concerning him or her, or similarly significantly affects him or her.

9. Satisfaction of rights

Overall, the Company ensures that:

1. there are procedures allowing the Data Subjects to easily exercise their rights in order for all the actions required to be taken immediately;
2. the Company shall respond to a request submitted by the Data Subject without undue delay and within a maximum of thirty (30) calendar days. Should it be unable to satisfy a right exercised by the Data Subject, the Company shall ensure that specific, sufficient and comprehensive reasoning is provided.
3. Except in the case of manifestly unfounded or excessive requests, all issues relating to the satisfaction of the rights of Data Subjects shall be taken at no cost to the Subjects.

If the Data Subjects consider that the processing of their personal data infringes the regulatory framework in force for the protection of personal data, they shall have the right to lodge a complaint with the Office of the Personal Data Commissioner (postal address: 1, Iasonos St, 1082 Nicosia, PO Box 23378, 1682 Nicosia, Telephone: +357 22818456, Fax: +357 22304565, Email: commissioner@dataprotection.gov.cy

10. POLICY FOR 'COOKIES' PROGRAMS

10.1. General

The Company's website uses 'Cookies' software in compliance with current legislation. 'Cookies' are small text files containing information and stored on the user's computer (or on other devices with Internet access, such as a smartphone or tablet) when visiting a web page. 'Cookies' do not harm a user's computer or the files stored thereon. Without cookies, it would be impossible to store a user's personal preferences.

'Cookies' help collect information necessary to measure the effectiveness of websites, to improve and upgrade their content, to adapt it to the demands and needs of users, and to measure the effectiveness of the presentation and promotion of the website on third-party websites. **The 'Cookie'-type files used on the Company's website do not collect information that personally identify users and are not made aware of any document or file stored on users' computers.**

The information collected by the 'Cookies' may include the type of browser used by a user, the type of computer, the operating system, the internet service providers and other such information. Moreover, the information system of the website automatically collects information concerning the sites visited by a user and links to third-party websites that may be found on the Company's website.

10.2. Which 'Cookies' are used by the Company

The Company's website, much like all websites, use 'cookies' to operate smoothly and serve users as much as possible. The four categories of cookies used are outlined below:

A) Necessary cookies

'Necessary Cookies' help to make the website useful, enabling basic functions such as page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

B) Preference cookies

'Preference Cookies' enable the website to remember information that changes the way the website behaves or looks, such as the preferred language or region that the user is in.

C) Statistics Cookies

Statistics cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

D) Marketing Cookies

Marketing Cookies are used to track the visitors of a website. The intention is to display ads that are relevant and engaging to them (visitors) and therefore more valuable to third party publishers and advertisers.

Cookies we use

Cookies	Cookie Purpose Description	Opt-Out Link/More details regarding specific privacy policy
Google Analytics	We use Google Analytics to understand how our media campaigns work and how you interact with our website in order to improve the user experience.	https://tools.google.com/dlpage/gaoptout
Google tracking cookies	Google tracking cookies enable us to understand if you complete certain actions on our website(s) after you have seen or clicked through one of our adverts served via Google. Based on the content you have engaged with on our websites Google are able to deliver some targeted adverts across other Google partner websites.	https://support.google.com/ads/answer/2662922?hl=en
Facebook	Facebook helps you stay in touch with your network through their website/mobile application. We make it easier for you to share any content of interest on Facebook and sometimes, we may present with some targeted adverts on Facebook based on your engagement with our website(s).	https://en-gb.facebook.com/help/568137493302217
LinkedIn	The LinkedIn insight tag allows us to perform campaign reporting and unlock valuable insights about website visitors that may come via the campaigns we run on LinkedIn.	https://www.linkedin.com/help/lms/answer/65521/the-linkedin-insight-tag-overview?lang=en
YouTube	We embed videos or insert links to videos from YouTube on our website(s). As a	https://support.google.com/ads/answer/2662922?hl=en-GB

	result, when you visit a page with content embedded from or linked to YouTube, you may be presented with cookies from YouTube.	
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10.3. Managing and Deleting ‘Cookies’

Most browser menus contain options on managing ‘Cookies’. Depending on the choices provided to users by the browser, a user may allow the installation of ‘Cookies’, disable/delete existing ‘Cookies’ or be alerted each time ‘Cookies’ are received. Instructions on managing and deleting Cookies can usually be found in the ‘Help’, ‘Tools’ or ‘Edit’ menu of each browser. Users can also find more detailed guidance at <http://www.youonlinechoices.com>, explaining in detail how to control and delete ‘Cookies’ in most browsers.

The user must be aware that if they reject or disable Cookies on the website of the Company, the functionality of the websites may be partially impaired. Furthermore, disabling a ‘Cookie’ or category of ‘Cookies’ does not delete the corresponding file from the browser. This action must be taken by users themselves by changing the internal settings of their browser.

11. Changes to this Policy

The Company reserves the right, when deemed expedient, to amend this Policy, whether in part or in whole, at its absolute discretion, and to post this amendment on its website. Any amendment hereto shall enter into force as soon as the amended Policy is posted on the Company website.

12. Contact

For any questions regarding this Policy, users may contact the Company at personaldata@commit-global.com.