

«20» July 2021	

Policy
WOLFFING LTD
Registration number -HE434003
with respect to processing of personal data

1. General provisions

1.1. This Policy of WOLFFING LTD regarding the processing of personal data (hereinafter the "Policy") is developed in pursuance of the requirements of the legislation of the Cyprus Republic to ensure the protection of human and civil rights and freedoms in the processing of their personal data, including the protection of the rights to privacy, personal and family secrets.

1.2. The Policy applies to all personal data processed by the Operator.

1.3. The Policy applies to the relationships in the field of personal data processing that have arisen with the Operator both before and after the approval of this Policy.

1.4. In accordance with the requirements of the legislation of the Cyprus Republic, this Policy is published in free access on the information and telecommunications network Internet on the website of the Operator.

1.5 Basic Concepts Used in the Policy:

Personal data - any information relating to a directly or indirectly identified or identifiable individual (the subject of personal data);

Operator of personal data (operator) - a state body, municipal authority, legal entity or individual, independently or together with other persons organizing and (or) carrying out processing of personal data, as well as determining the purpose of personal data processing, the composition of personal data to be processed, actions (operations) performed with personal data;

Processing of personal data - any action (operation) or a set of actions (operations) with personal data performed with or without the use of automation. Processing of personal data includes, but is not limited to:

- collection;
- record;
- systematization;
- accumulation;
- storage;
- clarification (updating, modification);
- extraction;
- use;

- transmission (distribution, provision, access);
- depersonalization;
- blocking;
- deletion;
- removal.

Automated processing of personal data - processing of personal data using computer technology;

dissemination of personal data - actions aimed at disclosure of personal data to an indefinite number of persons;

provision of personal data - actions aimed at disclosure of personal data to a certain person or a certain circle of persons;

Blocking of personal data - temporary termination of personal data processing (except when processing is necessary to clarify personal data);

Destruction of personal data - actions resulting in the impossibility to restore the content of personal data in the information system of personal data and (or) resulting in the destruction of tangible media of personal data;

Depersonalization of personal data - actions that make it impossible, without the use of additional information, to determine what personal data belongs to a particular personal data subject;

Personal data information system - a set of information technologies and technical means contained in databases of personal data and providing their processing;

Cross-border transfer of personal data - transfer of personal data to the territory of a foreign country to a foreign authority, a foreign individual or a foreign legal entity.

1.6 Basic rights and obligations of the Operator.

1.6.1 The Operator has the right:

1. 1) independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations provided by the legislation of the Cyprus Republic and regulations adopted in accordance with it;
2. 2) to assign the processing of personal data to another person with the consent of the personal data subject, unless otherwise provided by the legislation of the Cyprus Republic, on the basis of the contract concluded with that person. The person processing personal data on behalf of the Operator must comply with the principles and rules of the legislation of the Cyprus Republic;
3. 3) If the subject of personal data withdraws consent to the processing of personal data, the Operator has the right to continue processing personal data without the consent of the personal data subject on the grounds specified in the legislation of the Cyprus Republic.

1.6.2 The operator shall:

1. 1) Organize processing of personal data in accordance with the requirements of the legislation of the Cyprus Republic;
2. 2) to respond to requests and inquiries of personal data subjects and their legal representatives in accordance with the requirements of the legislation of the Cyprus Republic;
3. 3) to notify the authority responsible for protecting of personal data subjects' rights of the requested information within 30 days from the date of receipt of such request.

1.7 Basic rights of the subject of personal data. The subject of personal data has the right:

1. 1) Receive information relating to the processing of his personal data, except in cases prescribed by the legislation of the Cyprus Republic. Information shall be provided to the subject of personal data by the Operator in an accessible form, and shall not contain personal data relating to other subjects of personal data, except in cases where there are legitimate grounds for disclosure of such personal data;
2. 2) Require the operator to clarify his personal data, block or destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as to take statutory measures to protect their rights;
3. 3) to impose the condition of prior consent when processing personal data for the purpose of promoting goods, works and services on the market;
4. 4) To appeal in court against unlawful actions or omissions of the Operator in processing his personal data.

1.8 Compliance with the requirements of this Policy is monitored by an authorized person responsible for organizing the processing of personal data at the Operator.

1.9 Responsibility for violation of the requirements of the legislation of the Cyprus Republic and the Operator's regulations in the field of processing and protection of personal data shall be determined in accordance with the legislation of the Cyprus Republic.

2. Purposes of personal data collection

2.1 Processing of personal data is limited to achieving specific, predetermined and legitimate purposes. Processing of personal data that is incompatible with the purposes of personal data collection shall not be permitted.

2.2 Only personal data that meets the purposes of its processing may be processed.

2.3 The operator processes personal data for the following purposes:

- the performance of its activities;
- implementation of the legislation of the Cyprus Republic relations

2.4 Processing of customers' personal data may be carried out solely for the purpose of ensuring compliance with the legislation of the Cyprus Republic.

3. Legal basis for personal data processing

3.1 The legal basis for the processing of personal data is a set of laws and regulations, pursuant to which and in accordance with which the Operator carries out the processing of personal data, including:

- the legislation of the Cyprus Republic;

3.2 The legal basis for processing of personal data also includes:

- contracts concluded between the Operator and subjects of personal data;
- The consent of subjects of personal data to the processing their personal data.

4. The scope and categories of processed personal data,

Categories of subjects of personal data

4.1 The content and scope of processed personal data must comply with the stated processing purposes provided for in Section 2 of this Policy. Processed personal data shall not be excessive in relation to the stated purposes of its processing.

4.2 The operator may process personal data on the following categories of personal data subjects.

4.2.1 Customers and counterparties of the Operator (individuals):

- surname, first name, patronymic;
- telephone number;
- email address;
- mailing address;
- date of birth;
- marital status;
- other personal data provided by customers and counterparties (individuals), necessary for the conclusion and execution of contracts.

4.3 Processing of biometric personal data (information that characterizes the physiological and biological characteristics of a person, based on which his identity can be established) by the Operator is carried out in accordance with the legislation of the Cyprus Republic.

4.4 The operator does not process special categories of personal data relating to race, ethnicity, political views, religious or philosophical beliefs, health, intimate life, except in cases stipulated by the legislation of the Cyprus Republic.

5. Procedure and conditions of personal data processing

5.1 Processing of personal data shall be carried out by the Operator in accordance with the requirements of the legislation of the Cyprus Republic.

5.2 Processing of personal data shall be carried out with the consent of subjects of personal data to the processing of their personal data, as well as without such consent in cases stipulated by the legislation of the Cyprus Republic.

5.3 The operator carries out both automated and non-automated processing of personal data.

5.4 Employees of the Operator, whose job duties include the processing of personal data, are allowed to process personal data.

5.5 Processing of personal data shall be carried out by:

- receiving personal data verbally and in writing directly from the subjects of personal data;
 - Obtaining personal data from publicly available sources;
 - Entering personal data into the Operator's logs, registers and information systems;
 - Using other methods of personal data processing.
- 5.6 The disclosure to third parties and distribution of personal data without the consent of the subject of personal data, unless otherwise provided by the legislation of the Cyprus Republic.
- 5.7 The transfer of personal data to the bodies of inquiry and investigation is carried out in accordance with the requirements of the legislation of the Cyprus Republic.
- 5.8 The operator shall take the necessary legal, organizational and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, distribution and other unauthorized actions, including:
- Determines threats to security of personal data during its processing;
 - Adopts local normative acts and other documents regulating relations in the field of processing and protection of personal data;
 - Appoints persons responsible for ensuring security of personal data in structural subdivisions and information systems of the Operator;
 - Creates necessary conditions for work with personal data;
 - Organizes the accounting of documents containing personal data;
 - Organizes work with information systems, in which personal data are processed;
 - Stores personal data in conditions that ensure its safety and exclude unauthorized access to it;
 - Organizes training for the Operator's employees engaged in processing of personal data.
- 5.9 The operator shall store personal data in a form that makes it possible to identify the subject of personal data no longer than required by the purposes of personal data processing, unless the period of storage of personal data is established by the legislation of the Cyprus Republic or a contract.
- 5.10 When collecting personal data, including via the information and telecommunications network of the Internet, the Operator shall ensure recording, systematization, accumulation, storage, clarification (updating, changing), and extraction of personal data of citizens of the Cyprus Republic using databases located in the Cyprus Republic, except in cases specified in the legislation of the Cyprus Republic.
- collection;
 - record;
 - systematization;
 - accumulation;
 - storage;
 - clarification (updating, modification);
 - extraction;
 - use;
 - depersonalization;
 - blocking;
 - removal;

- destruction.

6. Updating, correcting, deleting and destroying personal data, responses to the subjects' inquiries for access personal data

6.1 Confirmation of the fact of personal data processing by the operator, the legal basis and purpose of personal data processing, as well as other information specified in the legislation of the Cyprus Republic, are provided by the operator to the subject of personal data or his representative when applying or receiving the request of the subject of personal data or his representative.

The information provided shall not include personal data relating to other personal data subjects, unless there is a legitimate reason to disclose such personal data.

The request must contain:

- Number of the main document certifying identity of the subject of personal data or his/her representative, information about the date of issue of the said document and the authority that issued it;
- Information confirming participation of the subject of personal data in relations with the Operator (contract number, contract conclusion date, conventional word mark and (or) other information), or information otherwise confirming the fact of personal data processing by the Operator;
- Signature of the subject of personal data or his/her representative.

The request may be sent in the form of an electronic document and signed by electronic signature in accordance with the legislation of the Cyprus Republic.

If the personal data subject's application (request) does not reflect all necessary information in accordance with the requirements of the legislation of the Cyprus Republic, or if the subject does not have the rights of access to the requested information, a reasoned refusal shall be sent.

The subject of personal data subject's right of access to his personal data may be restricted in accordance with the legislation of the Cyprus Republic, including if the subject's access to his personal data violates the rights and legitimate interests of third parties.

6.2 If inaccurate personal data is revealed when the subject of personal data or his/her representative appeals, the operator shall block personal data relating to the subject of personal data from the moment of such appeal or receipt of said request for the period of verification, provided that the blocking of personal data does not violate the rights and legitimate interests of the subject of personal data or third parties.

If the fact of inaccuracy of personal data is confirmed, the operator shall clarify personal data within seven working days from the date of submission of such information and remove the blocking of personal data on the basis of information provided by the subject of personal data or his representative, or other necessary documents.

6.3 If unlawful processing of personal data is detected when the subject of personal data or his/her representative contacts (requests), the Operator shall block unlawfully processed personal data relating to that personal data subject from the moment of such contact or request.

6.4 When the purpose of personal data processing is achieved, as well as in case of withdrawal of consent to its processing by the subject of personal data, personal data shall be destroyed if:

- Unless otherwise provided in the contract to which the personal data subject is a party, beneficiary or guarantor;
- The operator shall not be entitled to carry out processing without the consent of the personal data subject on the grounds stipulated by the legislation of the Cyprus Republic;
- Unless otherwise stipulated by another agreement between the operator and the subject of personal data.

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