

# **Privacy Notice (according to Article 13)**

This Privacy Notice aims to inform and assure you that Birmanos Enterprises Ltd (hereby refer to as **Company** or **we** the managing company of the QBlu Plaza) handles your personal information with respect to your personality and your rights and in accordance with Regulation (2016/679 (EU) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the **Regulation**).

This Notice addresses all natural persons who visit the QBlu Plaza and wish to have a customer relationship with us or enjoy our services.

**Personal Data** means any information about you, that could identify you directly or indirectly, such as your name, ID number, phone number.

**Processing** means any operation or set of operations which is performed on Personal Data, by automated means or otherwise, including collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

We ask you to read this Privacy Notice carefully as it contains important information on who we are, how and why we collect, store, use and share your personal information, your rights in relation to your personal information and on how to contact us and the supervisory authorities in the event that you have a complaint.

1. Who we are	<p>Controller:</p> <p>Birmanos Enterprises Ltd Konstantinou Palaiologou, 41, 6036, Larnaca, Cyprus Tel.: +357 24 821855 Fax: +357 24 662922 Email: <a href="mailto:info@qbluplaza.com">info@qbluplaza.com</a>. Web: <a href="http://www.qbluplaza.com">www.qbluplaza.com</a>. Registered no.: HE 365443</p> <p>Data Protection Officer (DPO):</p> <p>Harris Kyriakides LLC 115 Faneromenis Avenue, Antouanettas Building 6031 Larnaca Tel.: 24 201600 Fax: 24 201601 Email: <a href="mailto:dpTEAM@birmanos.com">dpTEAM@birmanos.com</a></p>
2. Our sources of collecting Personal Data and the Personal Data we process.	<p>We process your Personal Data as a company which manages the QBlu Plaza. Furthermore, we process and collect Personal Data that we receive from other affiliated companies within the Quality Group such as JW Pegasus Ltd Radisson Blu Hotel Larnaca which is located in the QBlu Plaza) or third parties, such other Companies hosted in the Plaza (eg.- Dolce Experience Ltd, V.K.C.A Quality Ltd, M.C.S Quality IP Ltd).</p>

	<p><b><i>Information we collect</i></b></p> <p>The Personal Data we collect are the following:</p> <ul style="list-style-type: none"> <li>(a) When you contact our calling center: name, surname and contact details;</li> <li>(b) For reservation at our restaurants: name, surname and contact details;</li> </ul>
3. The purpose for processing your Personal Data and the legal ground of this processing.	<p>We collect and process Personal Data in full compliance with the provisions of the Regulation as well as the national legislation.</p> <p>In the paragraph below (3.1 to 3.4) there is a more detailed analysis of the purposes and the legal ground of the processing.</p>
3.1 For the performance of a contract (Article 6 (1) (b))	<p>We process your Personal Data, to be able to provide our services to you as a customer of the Plaza, as a customer to our restaurants and also as a customer who uses the parking at the Plaza.</p>
3.2 For the purposes of the legitimate interests pursued by us or by a third party (Article 6 (1) (f))	<p>Except for the above case, either we or third parties, process your Personal Data when necessary, except if your fundamental rights and freedoms override the above interests. Below are some examples:</p> <ul style="list-style-type: none"> <li>(A) in the public and/or market research in general, if you have not exercised the right to object;</li> <li>(B) in court proceedings and/or to claim our legal claims;</li> <li>(C) in the context of the operation and security of the IT sector of the Company;</li> <li>(D) in the context of preventing and clarifying criminal offenses;</li> <li>(E) for the purpose of improving our services and products.</li> </ul> <p>It is noted that the CCTV system established in our premises aims at providing a safe and secure environment for our employees and customers/clients and the smooth operation of the Plaza.</p>
3.3 Due to your consent (Article 6 (1) (a))	<p>If you give your consent on the processing of your Personal Data for specific purposes, such as for direct marketing purposes, the legal ground for the processing of your Personal Data is your <b>express</b> consent.</p> <p>Please note that you may at any time withdraw your consent. The validity of this revocation will concern the future. Furthermore, it should be noted that the above also applies if you gave us your consent before the 25<sup>th</sup> of May 2018.</p>

<p>3.4 For compliance with a legal obligation (Article 6 (1) (e))</p>	<p>The Company is subject to various legal obligations, such as the obligations arising from the Income Tax Law 2002 (Law 118(I)/2002) or the tax legislation in general.</p> <p>The legal obligations vary according to our relationship (i.e. If you are a customer of Plaza, customer at the restaurants or customer at the Parking. Therefore, the Company is obliged to process your Personal Data in order to comply with the above obligations.</p>
<p>4. Who we share your data with</p>	<p><b><i>Within the Company</i></b></p> <p>In the course of the Company's operation, the relevant employees responsible for the performance of our contractual and legal obligations receive the necessary data.</p> <p>Moreover, we might share your Personal Data with other affiliated companies within the Quality Group, if this is necessary for the performance of our obligations or to fulfill your needs. For example, your data might be transferred to DOLCE EXPERIENCE LTD and/or V.K.C.A QUALITY LTD and/or, M.C.S QUALITY IP LTD.</p> <p><b><i>Outside the Company</i></b></p> <p>Under Article 28 of the Regulation, we have the right to designate a processor. In such a case, it is likely that the processor will receive your Personal Data for the above purposes. For example, we might designate as processors IT companies and Cloud Providers (such as Toolbox or CRM companies), consultancy companies such as accountants or law firms, as well as marketing companies and companies providing security services.</p> <p>It is possible for us to share your Personal Data to other people/companies/organisations if you have given us your express consent for such transfer.</p>
<p>5. How long your Personal Data will be kept for</p>	<p><b>For existing customers/clients</b></p> <p>We will hold your Personal Data for as long as is necessary to provide our services to you as a customer and in any case no longer than two (2) years or the period required by the applicable Taxation law, or according to the relevant directive of the Commissioner of Personal Data.</p> <p>In the case we hold your Personal Data because you have made a reservation at one of the restaurants of the Plaza, we will hold your collected Personal Data for (1) one month.</p> <p><b>For visitors of the Plaza</b></p> <p>The Company has installed CCTV in the Plaza and also in the parking space. We will hold your Personal Data captured through the installed CCTV system for a period up to three months for security purposes.</p>

<p>6. Transfer of your Personal Data outside the EEA or to an international organization</p>	<p>We do not transfer your Personal Data to countries located outside the European Economic Area (EEA).</p>
<p>7. Keeping your Personal Data secure</p>	<p>We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to have access to it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.</p> <p>We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.</p>
<p>8. Your rights</p>	<p>You have a number of important rights, under the Regulation. Specifically:</p> <ul style="list-style-type: none"> <li>(a) <b>right to access your Personal Data</b> (Article 15): meaning you might receive information and/or copy of the personal information we hold free of charge.</li> <li>(b) <b>right to rectification</b> (Article 16): you might ask us to correct any mistakes in your information which we hold.</li> <li>(c) <b>right to erasure</b> (“right to be forgotten”) (Article 17): you might ask us to erase the personal information concerning you.</li> </ul> <p>However, we reserve the right to deny the erasure, if the processing is necessary for compliance with a legal obligation, for reasons of public interests or for the establishment, exercise or defense of legal claims.</p> <ul style="list-style-type: none"> <li>(d) <b>right to restriction of processing</b> (Article 18): you might require us to restrict our processing of your Personal Data if you contest the accuracy of your Personal Data, the lawfulness of the processing, or you have objected to processing (according to article 21, see below) and you wait for our reply whether we have legitimate grounds which override yours.</li> <li>(e) <b>right to data portability</b> (Article 20): you have the right to request and receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit those data to a third party under certain circumstances.</li> <li>(f) <b>right to object</b> (Article 21): you have the right to object at any time to processing of Personal Data concerning you which is based on performance of a task carried out in the public interest or for the purposes of the legitimate interest pursued by us or third parties (article 6 (1) (e) and (f) of the Regulation).</li> </ul> <p>You also have the right to object at any time to processing of personal information concerning you for direct marketing or decisions being</p>

	<p>taken by automated means which procure legal effects concerning you or similarly significantly affect you.</p> <p>In case you wish to exercise this right, we shall no longer process your Personal Data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claim.</p> <p>(g) <b>right to withdraw your consent:</b> you reserve the right to withdraw your consent at any time. However, the withdrawal of the consent does not affect the lawfulness of the processing based on consent before its withdrawal.</p> <p>If you wish to exercise any of the above rights or to ask any questions or clarifications, please do not hesitate to contact our Data Protection Officer at: <a href="mailto:dpteam@birmanos.com">dpteam@birmanos.com</a>.</p> <p>If you like to exercise any of those rights, please:</p> <ul style="list-style-type: none"> <li>• email or write to us or our Data Protection Officer;</li> <li>• let us have enough information to indentify you;</li> <li>• let us have proof of your identity and address; and</li> <li>• let us know the information to which your request relates.</li> </ul> <p>Please note that if you would like to unsubscribe from any email newsletter you can also click on the ‘unsubscribe’ button at the end of the email newsletter. It may take up to 10 days for this to take place.</p>
<p>9. How to complain</p>	<p>We hope that our Company and specifically the Data Protection Officer can resolve any query or concern you raise about our use of your information.</p> <p>However, the Regulation also gives you right to logde a complaint with the supervisory authority, the Commissioner of Personal Data Protection. For more information concerning the process of filing a complain please visit the website <a href="http://www.dataprotection.gov.cy/">www.dataprotection.gov.cy/</a> or via e-mail at <a href="mailto:commissioner@dataprotection.gov.cy">commissioner@dataprotection.gov.cy</a> .</p>
<p>10. Are you obliged to provide us with your Personal Data?</p>	<p>You are required to provide your Personal Data to the extent that it is necessary for the services requested by you or in order to be in compliance with our legal obligations (see above paragraph 3.4).</p> <p>In case you refuse to give us your Personal Data, we will not be able to provide our services to you.</p>
<p>11. Automated individual decision-making</p>	<p>As a rule, we do not make automated decisions. If we make use of automated decision-making, you will be properly informed if this is necessary on the basis of the relevant legislation.</p>
<p>12. Is your data used for profiling?</p>	<p><b>Profiling</b> means any form of automated processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s performance at work, economic situation, personal preferences, interests, reliability, behaviour, location or movements.</p>

	We do not use your Personal Data for profiling.
13. Changes in this privacy notice	<p>This Privacy Notice was published on 07/03/2019 and last updated on 07/03/2019.</p> <p>We may change this Privacy Notice from time to time and in such case we will bring these changes to your attention. We also ask you to periodically visit our website for any updates of this privacy notice.</p> <p>You can directly contact our Company or our Data Protection Officer, in case you have any questions concerning this privacy notice or for any issues relevant to your Personal Data at <a href="mailto:dpteam@birmanos.com">dpteam@birmanos.com</a></p>