

Notice regarding the personal data collected from qbluplaza.com website (the “Website”).

We MCS Quality IP Ltd (“we” or “us” or the “Company” or “Quality”), collect and process your personal data (which may hereby referred to as “personal data” or as “data”), with full transparency and respect to your rights and personality.

We always collect and process your personal data according to the spirit of Regulation (EC) 2016/679 (hereinafter referred to as the “Regulation”), the main objective of which is to protect the personal data of individuals by establishing rules for both the protection of individuals with regards to the processing of personal data and for the free movement of such data. When there is a reference to a section below, it means a section of the said Regulation.

For the purposes of this notice, personal data means any information about you that establishes or can establish your identity, for example your name and surname, your telephone number, email address or your computer’s IP address.

Further processing of personal data means any act or series of acts performed on your personal data, including, inter alia, collection, recording, organization, structuring, storage, data search, use, any way of disposal, erasure or destruction.

This Privacy Notice (“Notice”) explains what personal data we are collecting when you visit our website, the way we process your personal data and the third parties with which we are sharing these personal data. Further we inform you about your rights according to the Regulation.

1. Who is the controller of your personal data?

MCS Quality IP Ltd
Registration No.: HE365864
Address: Constantinou Paleologou 41,
6036 Larnaca, Cyprus
Phone Number: +357 24 821855
Fax Number: +357 24 662922
E-Mail Address: dpteam@qualitydevelopments.com

2. Contact details of our data protection officer:

Harris Kyriakides LLC

Address: 115 Faneromenis Avenue, Antouanettas Building
6031 Larnaca
Telephone: +357 24 201600
FAX: +357 24 201601
E-Mail: dpteam@qualitydevelopments.com

3. How do we process your personal data collected through our Website?

We process your personal data when for example you contact us, through e-mail, in order to be able to respond to your request. Your personal data is not transmitted to third parties, meaning persons or Companies outside Quality, unless it is necessary for fulfilling your request. We will like to ensure you that complete confidentiality is maintained while processing your personal data.

Some of the data we collect through our Website are used for the improvement of user experience or for statistical purposes. For more information you can continue reading this Privacy Notice.

4. How long do we keep your personal data collected from our Website for?

The personal data we collect through our Website are only kept for as long as necessary for fulfilling the purpose for which they were collected. In regard to your personal data that we collect from our website, you reserve the rights mentioned in paragraph 5, to the extent that these rights are applicable.

5. What are your rights according to the Regulation?

According to the New General Data Protection Regulation 2016/679 you have the following rights:

(a) right to access your personal data (Art. 15 of the Regulation): Under this right you may receive information free of charge and/or copies of your personal data, held by us.

(b) right to rectification (Art. 16 of the Regulation): Under this right, you may at any time request to correct or complete your data.

(c) right to erasure (“right to be forgotten”) (Art. 17 of Regulation): Under this right you can request from us to delete your personal data. It is clarified that we reserve our right to deny the said erasure, if the processing is necessary for us to comply with our legal obligation, for reasons of public interest and/or for the exercise of our legal claims and/or if the Regulation gives us such right.

(d) right to restriction of processing of your personal data (Art. 18 of Regulation): Under this right you may request from us to restrict the processing of your personal data if you contest its accuracy, the lawfulness of its processing and/or because it is not necessary for the processing purposes they had been collected for and/or when you have already objected to us in processing your data in accordance with section 21 (see **Right to Object below**) and you expect our position as to the legitimate grounds which override your opposition.

(e) right to data portability (Art. 20 of Regulation): Under this right you may receive your data, in a structured, commonly used and machinereadable form, to transfer it to other organisations/companies or ask from us to directly do so on your behalf.

(f) right to object (Art. 21 of Regulation): You have the right at any time to object to the processing of your personal data, including profiling, based on the legitimate and/or public interest (section 6 (1) (e) and (f)) when you deem that this is justified due to a particular situation that concerns you.

In case that you do not agree, we shall no longer process your personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or if the processing serves the establishment, exercise or defence of legal claims.

You may object at any time to the processing of your personal data for purposes related to direct marketing, including profiling, to the extent it concerns direct marketing. In case where we process your personal data for marketing purposes and you object to the said processing, the processing for the said purposes will cease.

Your abovementioned right may be exercised by contacting us (we shall provide an email) you collaborate with or the Customer Service Centre, or the our Data Protection Officer or by sending us an email at: dpteam@qualitydevelopments.com.

(g) right to withdraw your consent: You have the right at any time to withdraw your consent to collection and processing of your personal data. In such case, the withdrawal of the consent does not affect the legality of the data processed prior to the revocation.

It is noted that the abovementioned rights apply with the restrictions provided for in the Regulation. If you wish to exercise any of the above rights or for any questions regarding the processing of your personal data, you may contact our Data Protection Officer at: dpteam@qualitydevelopments.com

6. What personal data do we collect when you use our Website?

6.1. Without providing us your personal data:

When using our Website for information regarding our various services, without explicitly providing your personal data in any way, as for example your name, surname or your contact details, we collect the personal data which the browser or mobile application you use sends to our server. This data is technically necessary for better presentation of our Website, as well as for reasons of security and improving your browsing experience. Some of the data we collect are the following:

- IP Address.
- Date and time of visit.
- The webpage where your visit comes from
- The Internet browser you use to visit our webpage
- Your operating system.
- Your internet browser version, language and the difference of the time zone.

Our use of cookies

In addition to the aforementioned personal data, our Website saves cookies on your PC.

Cookies are text files containing small amounts of information, which your computer or mobile device downloads when you visit a website. Cookies provide visitors access to several functionalities.

Please note that our Website use cookies. Further note that most browsers accept the use of cookies automatically. We remind you that you may disable cookies through your browser's settings. In such case you will not be able to use all of our webpage's functions. We note that cookies cannot install any program or virus on your PC.

This webpage uses the following cookies categories:

- Session cookies (see a)
- Persistent cookies (see b)

(a) Session cookies are automatically erased from your computer, when you close your internet browse or logout from our Website. This type of cookies help our Website identify your PC, when you visit our Website more than once.

(b) Persistent cookies are automatically erased upon expiration of a predetermined timeframe. This type of cookies can be erased through the settings of your browser.

You can manage preferences for Cookies directly from within your browser and prevent – for example – third parties from installing Cookies.

Through browser preferences, it is also possible to delete Cookies installed in the past, including the Cookies that may have saved the initial consent for the installation of Cookies by this website.

Our website's use of the Google Analytics service.

Our Website uses the Google Analytics service, a service of Google Inc. (“**Google**”) for purposes of improving the user experience and for statistical purposes. Google Analytics use cookies, that are saved on your PC and analyze the way you use our Website. The information collected through these cookies are send directly to a server of Google, located in the USA. However, in the event of activation of IP anonymization on this website, your IP address will be shortened by Google for users located within member states of the European Union or in European Economic Area. Google will use this information on behalf of the operator of this Website to evaluate your use of the website, to send reports on the website activities and to provide further information on the use of the website.

The IP address provided from your Browser will not be used and combined with other Google services to identify you.

We use Google Analytics to analyze the way our Website is used, in order for us to be able to make the overall experience better.

In exemptional cases that Google Analytics transfers your personal data in third countries (countries outside EU or European Economic Area), Google has adopted the EU-US Privacy Shield (<https://www.privacyshield.gov/EU-US-Framework>).

Legal basis for the use of Google Analytics is Art. 6 (1) (f) of the Regulation.

However, you can disable the collection of data related to the way you use this webpage through the Google Analytics service, by following this link, by installing the relevant plug in to the browser you use: <http://tools.google.com/dlpage/gaoptout?hl=de>.

Our website's use of Facebook Like & Share

Our Website uses the Facebook (Facebook, 1601 South California Avenue, Palo Alto, CA 94304, USA) Like & Share buttons (“*like button*”, “*share button*” or “*like & share buttons*”). You can learn more about Facebook’s Like & Share buttons at <https://developers.facebook.com/docs/plugins/>.

By clicking the like and share buttons on our website, while you are connected to your Facebook profile, Facebook links your profile with your visit on our website. Then Facebook may publish on your Facebook profile your activity on our website, e.g. the content that you “liked”. Please note that we don’t control the way that Facebook handles your personal data.

Should users of our Website choose to on like & share buttons, we are not responsible for the terms of personal data processing and protection followed by these parties.

We cannot, as a rule, affect the content and the way webpages that belong to other Companies/Organizations function.

Our website's use of Google Maps plugin

On this website we use the services of Google Maps. This allows us to show you interactive maps directly on our website. By clicking on Google Maps on our Website, your personal data referred in the Privacy Notice of Google (which can be found here <https://policies.google.com/privacy?hl=de&gl=en>) are transferred to Google.

Your personal data are transferred to Google regardless of you have an account and you are logged in to it, or if you don’t have a user account. When you're logged in to Google, your data will be assigned directly to your account. If you do not wish to be associated with your profile on Google, you must log out before clicking on the Google Maps.

Our website's use of Hotjar Ltd

Our Website uses “Hotjar Ltd”, which is a session recording and heat mapping service. This service is used to display the areas of a page where visitors most frequently move the mouse or click and therefore which parts of the website are points of interest. Through the above service we can monitor and analyze the web traffic and keep track of the visitors behaviours. Hotjar honors generic “Do Not Track” headers, which means the browser can tell its script no to collect your data. You can find more information about how to opt-out here <https://www.hotjar.com/legal/compliance/opt-out>.

Legal basis for this way of processing your personal data is Art. 6 (1) (f) of the Regulation. You can always object to this way of processing of your personal data, by opting out as described above.

6.2. When you provide us with your personal data

Contact us form

If you choose to contact us through our website, we collect and process the personal data, that you provide us, including:

- your name,
- surname,
- email address,
- mobile number

Please note that we process the personal data you provide us only in order to reply to your request.

7. Links to other websites or electronic services

We would like to inform you that this website links to other websites or electronic services of third parties. However, please note that we are not responsible for the terms of personal data processing and protection followed by these parties.

We cannot, as a rule, affect the content and the way webpages that belong to other Companies/Organizations function.

8. How can you file a complaint?

In case that you have any complaint and/or dispute in regards to the way we use your personal data, you are invited to notify accordingly our Personal Data Protection officer and we will directly undertake to investigate and inform you in regards to your complaint.

In any case, you are entitled to submit a complaint to the Commissioner of Personal Data Protection. You can find information regarding the filing of complaints on the relevant website (<http://www.dataprotection.gov.cy>).

9. Are you obliged to provide your personal data?

You are only obliged to provide us your personal data if you wish to contact us through our website. In that case, we need the above data in order to be able to reply to your request or fulfill your order.

10. Does automated individual decision-making take place?

Automated individual decision-making means the process of making decisions through automated means of processing personal data/details, without human intervention, e.g. automated refusal of booking a venue or ticket.

As a rule, we don't make automated decisions. In case of use of automated decision-making in some cases, you will be properly informed if this is necessary on the basis of the relevant legislation.

11. Are your data used for automated profiling?

Automated profiling means the automated processing of your personal data for evaluating your personal aspects for profiling.

In principal we don't use your data for automated profiling.

12. Contact details

If you wish to exercise any of your abovementioned rights or for any clarification, you can contact our Data Protection Officer at the email address: dpteam@qualitydevelopments.com.

13. Changes/ amendments to the Privacy Notice.

We reserve the right to amend the present private notice from time to time, informing you accordingly each time. In such case the number and issuance date of the private notice displayed will be reviewed.

Do not hesidate to contact us through our Data Protection Officer for anything you need regarding the present notice.