

This privacy policy (hereinafter the “Private Policy”) sets out how we, Ayia Napa Marina Hospitality Limited, a private limited liability company registered in Cyprus with registration number HE 403931, and registered office address at Kronou 1, Pera Chorio Nisou, 2571, Nicosia (hereinafter “we” “us” or “our”) handle and treat personal information of the following persons (hereinafter “you”, “your” or “yours”): (a) persons that access our website at <https://jrobuchoncyprus.com/>; (b) persons that provide us with their personal information for the purposes of negotiating and/or entering into any agreement with us with regard to, inter alia, sub-lease and/or acquisition and/or license of immovable property, provision of services; (c) persons that have subscribed to us for marketing and/or newsletter purposes (d) our existing employees; (e) persons that apply to work with us; (f) persons whose personal information we obtain from third party sources and/or partners, whom you have engaged and/or got in touch with, in relation to our services and/or our immovable properties; and (g) persons whose personal information we may process once they enter our premises located in Cyprus, at 52 Ayia Thekla Street, 5330, Ayia Napa, Cyprus.

We value your privacy and, through the Privacy Policy, we aim to explain our approach to any personal information that we may collect about you as well as inform you of your rights under applicable law.

The Privacy Policy should be read in conjunction with our cookies policy (hereinafter the “Cookies Policy”) that may be found here. Please ensure that you read and understand the contents of the Privacy Policy as well as our Cookies Policy.

The Privacy Policy and the Cookies Policy may, at our discretion, be updated from time to time. Please ensure that you refer back to the respective policy regularly to keep yourself up to date with any amendments.

#### Who We Are

Ayia Napa Marina Hospitality Limited serves the franchisee of Joel Robuchon International in Cyprus. Ayia Napa Marina Hospitality Limited operates L’ Atelier de Joël Robuchon & Le Deli Robuchon at Ayia Napa Marina in Cyprus.

## How You Can Contact Us

If you have any queries regarding the Privacy Policy or the way in which we are managing your personal information or in case you wish to exercise any of your rights set out in the Privacy Policy, please contact us by:

- (a) e-mail at [info@anmhl.com](mailto:info@anmhl.com)
- (b) calling us on +357 23 300 500.

Please note that, for the purposes of applicable data protection law (including, without limitation, the General Data Protection Regulation EU 2016/679), we are the data controller and our data protection officer is Mr. Pavlos Andreou.

## What We Collect

We may collect and process a variety of personal information, including, without limitation, the following:

(a) when you access our website, we may, depending on the circumstances and/or your request(s), collect and process the below data:

Name and surname;

Contact information including your e-mail address, telephone number and registered/residential address;

Other information relevant to your request and/or provision of any services you request us to provide you with;

Internet Protocol (IP) address, the name of your internet service provider (ISP) depending on the configuration of your ISP connection, the date and time of your visit to our website, the length of your session, the pages which you have accessed, the number of times you access our website within any month, the file URL you look at and information relating to it, the operating system which your computer uses; and/or

Other information relevant to surveys and/or offers and/or promotions.

(b) when you provide us with your personal information for the purposes of negotiating and/or entering into any agreement with us, we may collect and process the below data:

Name and surname;

Contact information including your e-mail address, telephone number and registered/residential address;

Other information relevant to your request and/or provision of any services you request us to provide you with;

Payment information; and/or

VAT identification number.

(c) when you provide us with your personal information for marketing purposes and/or for receiving our newsletter and/or other marketing material from us, we may collect and process the below data:

Name and surname; and/or

Contact information including your e-mail address, telephone number and/or registered/residential address.

(d) if you are employed by us, we are processing and may collect and process in the future the below data:

Name and surname;

Job title;

Contact information including your e-mail address, telephone number and registered/residential address;

Social Insurances Number;

Copy of your passport or ID card;

Bank account details (for instance IBAN number, branch etc);

CV, including, without limitation, your date of birth and/or gender if you provide it to us, your education, employment history and similar matters and similar information that you may provide to us;

Information relating to previous criminal convictions;

Information relating to any health problems that you may have; and/or

Other information relevant to your recruitment by us,

(e) if you are looking to be employed by us, we may collect and process the below data:

Name and surname;

Job title;

Contact information including your e-mail address, telephone number and residential address;

Social Insurances Number;

Copy of your passport or ID card;

Bank account details (for instance IBAN number, branch etc);

CV, including, without limitation, your date of birth and/or gender if you provide it to us, your education, employment history and similar matters and similar information that you may provide to us;

Information relating to previous criminal convictions;

Information relating to any health problems that you may have; and/or

Other information relevant to potential recruitment by us,

(f) if you have engaged and/or got in touch with third party sources and/or partners with whom we co-operate, we may collect and process the below data:

Name and surname;

Contact information including your e-mail address, telephone number and registered/residential address;

Other information relevant to your request and/or provision of any services you request us to provide you with;

Payment information;

VAT identification number; and/or

Internet Protocol (IP) address, the name of your internet service provider (ISP) depending on the configuration of your ISP connection, the date and time of your visit to our website, the length of your session, the pages which you have accessed, the number of times you access our website within any month, the file URL you look at and information relating to it, the operating system which your computer uses.

(g) if you enter our premises, we may collect and process the below data:

Image and likeness;

Date and time of entry; and/or

Date and time of exit.

## **Why We Collect Your Personal information**

We collect and process your personal information for the following purposes:

- (a) verify your identity;
- (b) allow you to safely browse and use our website;
- (c) deliver to you any service and/or fulfill any task that you request of us or of any of the third parties and/or partners with whom we co-operate;
- (d) perform our contractual obligations towards you and/or the entity you represent;
- (e) investigate or settle inquiries or disputes;
- (f) comply with any applicable law, court order, other judicial process, or the requirements or orders of a regulatory authority;
- (g) enforce our agreement(s) with you and/or the entity you represent;
- (h) employment purposes;
- (i) recruitment purposes and/or
- (j) safety and integrity of our premises, staff and property.

## **Legal Bases**

We collect and process your personal information on any one or more of the following legal bases:

- (a) in order to perform our obligations in accordance with any contract that we may have with you or in order to take steps to enter into a contract with you; and/or
- (b) that it is in our legitimate interest or in a third party's legitimate interest to process your personal information; and/or
- (c) it is our legal obligation to process your personal information to comply with any legal obligations imposed upon us; and/or

(d) on the basis that you have provided us with your explicit consent to process the personal information you have supplied us with; and/or

(e) in reliance on any other applicable legal basis provided under applicable laws and regulations.

## **How We Process Your Personal Information**

### Performance of services

We process your personal information that you voluntarily provide to us and/or that have requested from you with regard to performing any service and/or task that you request from us or from any of the third parties and/or partners with whom we co-operate.

### Business administration and legal compliance

We use your personal information for business administration and legal compliance purposes:

- (a) to maintain our internal records up to date;
- (b) when we are required under applicable laws and regulations to comply with an obligation imposed upon us;
- (c) to enforce our legal rights;
- (d) to protect the legal rights of third parties; and
- (e) in connection with a transaction to which we are a party to.

### Employees

We process your personal information in order to:

- (a) comply with our obligations towards you, in our capacity as your employer, including, without limitation, make relevant deductions from your salary and pay relevant social insurance contributions;
- (b) ensure that we provide equal opportunities to all of our employees; and
- (c) assess your performance in order to award you accordingly or highlight areas where you can improve in order to perform better and/or contribute to our growth and success.

### Prospective employees

We process your personal information in order to:

- (a) assess your suitability for any position for which you may have submitted an application for employment with us, including, without limitation, secretary, sales executive, sales manager and various other positions; and
- (b) ensure that we provide equal opportunities to all of our prospective employees.

### Security

We maintain a video surveillance system through which we process certain of your personal information, i.e. your image and likeness, date and time of entry into and exit from our premises, in order to ensure the safety and integrity of our premises, property and other persons. The foregoing video surveillance system captures only images and no sound.

#### Website

We process your personal information in order to:

- (a) provide you the best possible browsing experience;
- (b) improve our digital presence and/or website;
- (c) allow you to gain access to marketing material and other content that may be downloaded from and/or viewed on our website; and
- (d) allow you to get in touch with us and/or submit any request and/or question that you may have.

## Your rights

You have the following rights in relation to the personal information we hold about you:

#### Right of access

You have the right to obtain confirmation as to whether or not personal information concerning you are being processed by us.

#### Your right to rectification

You have the right to obtain from us without undue delay the rectification of inaccurate personal information concerning you. If we have shared your personal information with others, we will let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

#### Your right to erasure

In certain circumstances (such as when you withdraw consent), you have the right to request from us the erasure of your personal information without undue delay and we have the obligation to erase the same without undue delay.

We are not required to comply with your request to erase your personal information if the processing of such information is necessary:

- (a) for compliance with a legal obligation; or
- (b) for the establishment, exercise or defense of legal claims.

There are certain other circumstances in which we are not required to comply with your erasure request, although the above two are the most likely circumstances in which we would deny that request.

#### Your right to object

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

Once you have objected, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

#### Your right to data portability

Where processing is based on your consent or on the performance of a contract with you; and such processing is carried out by automated means, you have the right to ask us to provide your personal information in a structured, commonly used and machine readable format and to transmit, where technically feasible, such information to another controller without hindrance.

#### Your right to restrict processing

You can ask us to “block” or suppress the processing of your personal information in certain circumstances, such as where you contest the accuracy of that personal information or you object to processing thereof. If we have shared your personal information with others, we will let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

#### Your right to withdraw consent

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time. However, you should be aware that if you choose to do so there may be potential consequences which we will tell you about at that time.

#### Your right to lodge a complaint with the supervisory authority

If you have a concern about any aspect of our privacy practices, including, without limitation, the way we have handled or handle your personal information, you can report such concern with the local supervisory authority, being the Office of the Commissioner for the Protection of Personal Data.

Please note that some of your above rights may be limited where we have an overriding interest or legal obligation to continue to process your personal information or where such information may be exempt from disclosure due to confidentiality or other reasons under applicable law and regulations.

In the event you wish to exercise any of your above mentioned rights please get in touch with us using the contact details referred to in paragraph 2 above. We reserve the right to ask you for proof of your identity if you contact us as aforesaid.

## **Security of information**

We are committed to ensuring that your personal information is and remains secure and confidential. In order to prevent unauthorised access, use or disclosure of your personal information, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information that we collect. Our security technologies and procedures are regularly reviewed to ensure that they are up to date and effective. We will take all steps reasonably necessary to ensure that your personal

information is treated securely and in accordance with the Privacy Policy and applicable law and regulations.

Information you provide to us is stored on our secure servers that are protected through access codes and a firewall. Unfortunately, the transmission of information via the internet is not completely secure. While we will take reasonable steps to protect all information submitted to us and/or received by us in accordance with the Privacy Policy, we cannot, in any event, guarantee the security of any information transmitted to us via e-mail and, in general, through the internet, and as such any transmission is at your own risk.

Certain other information you provide to us in paper form is stored in designated secure spaces within our premises where no unauthorised access is permitted.

All of our partners, employees, consultants, workers and data processors, who have access to, and are associated with the processing of your personal information, are obliged to respect the confidentiality and security of such personal information.

## **Processors and other controllers**

We may, if so required, appoint sub-contractor data processors such as, without limitation, document processing and translation services, IT systems or software providers, IT support service providers, document and information storage providers, who will process personal information on our behalf.

Further, we may, depending on the circumstances (e.g. if you are employed by us or if you request a specific service from us) appoint external data controllers where necessary, without limitation, lawyers, auditors, accountants, valuers or other third party experts.

When doing any of the above, we will comply with our legal and regulatory obligations in relation to your personal information, including, without limitation, maintaining appropriate safeguards in place.

Transmission of your personal information

Any information that we collect or that you provide to us may be shared and processed by any of the following categories of third parties as may (depending each time) be necessary:

- (a) sub-contractors and services providers who assist us in connection with the ways we use personal information (as set out above), including, without limitation, website hosting providers based within the European Union, website developers based within the European Union, marketing and analytics services providers located in the United States of America;
- (b) internally through our corporate network and offices for, inter alia, business administration purposes;
- (c) third party business partners and/or affiliates in order to provide you with and/or fulfil a request and/or service that you have requested from us;
- (d) public and governmental authorities, including, without limitation, regulatory authorities, tax authorities, and corporate registries;
- (e) credit institutions and other financial institutions;

(f) third party postal or courier providers who assist us in delivering our documents related to a matter that concerns you; and/or

(g) any third party to whom we disclose your personal information on the basis of a legal obligation imposed upon us under applicable laws and regulations.

The above is a non-exhaustive list of persons and entities with whom we might (depending on the circumstances) share your personal information with. There may be other instances and persons to whom we may disclose your personal information.

Any transmission of your personal information, as set out above, shall, at all times, comply with applicable laws and regulations.

#### Marketing preferences

Where we have your consent to do so (i.e. if you have subscribed to our newsletter or have consented that you'd like to hear about our offers, courses, services, news and educational blogs), we will periodically send you marketing communications via e-mail in relation to courses and services that we feel may be of interest to you.

We will afford you with the possibility to "opt-out" from such communications each and every time you receive a marketing e-mail, at no cost and expense. This may be done by clicking the "unsubscribe" link in the footer or main body of each and every marketing email you receive from us or by contacting us at [info@anmhl.com](mailto:info@anmhl.com).

Once you have "opted-out", you will be removed from our marketing and all other relevant lists and all the data that you have provided to us with in relation thereto will be deleted as soon as practically possible.

## Cookies and web analytics

For information relating to cookies kindly refer to the Cookie Policy that may be found [here](#)

Occasionally, we will use third party advertising companies to serve ads based on your prior visits to our website. For example, if you visit our website, you may later see an ad for our courses and services when you visit a different website. Read more about your options in the Cookie Policy.

Please note that we are using Google Analytics and Yandex Metrika for tracking our website traffic and the user data retention period is 26 months.

#### How long we keep your personal information for

Where we no longer require your personal information we will ensure that it is either securely deleted or destroyed or stored in a way which means it will no longer be processed and/or used by us. In particular:

#### Provision of Services

Subject to any further lawful processing (including, without limitation, requirement to retain personal information for compliance with a legal requirement to which we are subject to), we will retain your personal information for at least 2 years from the date of our first interaction with you.

## Employees

Subject to any further lawful processing (including, without limitation, requirement to retain personal information for compliance with a legal requirement to which we are subject to), personal information of employees will be retained for a period equal to the relevant limitation period of actionable claims prescribed under applicable law.

## Prospective employees

Subject to any further lawful processing (including, without limitation, your consent to us to retain such information, and/or requirement to retain personal information for compliance with a legal requirement to which we are subject to), personal information of prospective employees will be kept for a period of twelve (12) months, after which will be securely deleted or destroyed. You have the right to withdraw your consent at any time, without affecting the lawfulness of processing prior to withdrawal, by contacting us at [info@anmhl.com](mailto:info@anmhl.com)

## Persons entering/exiting our premises

Subject to any further lawful processing (including, without limitation, requirement to retain personal information for compliance with a legal requirement to which we are subject to and/or where processing is necessary on the basis of our legitimate purposes, for instance pursue a claim against a person for injury or damage to property), personal information of persons entering and exiting our premises will be retained for a period of 1 week from the moment of capture.

Retention of your information and subsequent deletion, destruction or storing in a manner that we no longer can use such information, will be in compliance with applicable laws and regulations.

## Persons accessing our website

Subject to any further lawful processing (including, without limitation, requirement to retain personal information for compliance with a legal requirement to which we are subject to and/or where processing is necessary on the basis of our legitimate purposes), personal information of persons that access our website and get in touch with us through the “Contact Us” page, for a period of 1 week from our last contact with them. With regard to processing and retention of personal information through our cookies please access the Cookie Policy for more information.

## Updates to the Privacy Policy

We may need to change this policy from time to time in order to make sure it stays up to date with the latest legal requirements and any changes to our privacy practices.

When we do change the policy, we will try to notify you about such changes. However, we encourage you to review this Privacy Policy periodically to be informed of how we use your personal information.

Last updated October 2021