

# KOICONNECT LTD: Privacy Policy

Last updated: March 27, 2025

## I. Introduction

### Welcome to KOICONNECT LTD!

KOICONNECT LTD values your privacy and is committed to protecting your personal data.

This Privacy Policy ("Privacy Notice") explains how KOICONNECT LTD (trading as "KoinSky"), including its licensors and affiliates ("Company", "we", "our", or "us"), collects, processes, and protects your information when you visit our website at <https://koinsky.com> (the "Website"), use our services ("Services"), or interact with us in any other way, such as through social media.

This Privacy Notice outlines the types of personal data we collect from you, either directly or through your organisation, as well as how we use and protect that data. It also details your rights regarding access, correction, and deletion of your personal information.

By using our Website or Services, you ("you", "your", "client", "client representative", "data subject") may be required to confirm your acceptance of this Privacy Notice.

For the purposes of this Privacy Notice, "personal data" refers to any information that can be used to directly or indirectly identify, contact, or locate you as a private individual ("Personal Data").

We process Personal Data in compliance with this Privacy Notice and applicable legislation, including the Cyprus Law on the Protection of Natural Persons with regard to the Processing of Personal Data and on the Free Movement of such Data (Law 125(I)/2018) and the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR"), and any other relevant national data protection laws applicable to Company (collectively, "Data Protection Law")

This Privacy Notice does not apply to third-party websites, services, or applications, even if they are accessible through our Website or Services.

By using our Services, you confirm that:

- You have read, understood, and agreed to this Privacy Notice.
- You are at least 18 years old.

If you do not agree with the terms set out in this Privacy Notice, please do not use our Services.

## II. Scope of the Privacy Notice

This Privacy Notice outlines how we process Personal Data in connection with:

- All matters related to you as a data subject, including the collection of personal data from forms filled out on the Website, browsing our site, providing information, taking steps prior to entering into an agreement with your organisation, and further processing for the performance of the agreement;
- Our Demo Mobile App or Web Demo (if applicable), as well as other events and marketing initiatives;
- Cookies that are used on our Website or during live chat operations;
- All of our statutory obligations with respect to the Data Protection Law, and any other laws and regulations that may be applicable to us.

### **III. Statement of the Privacy Notice**

Our principal obligations under the Data Protection Law include:

- Respecting individuals' rights;
- Processing personal data lawfully, fairly, and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
- Collecting personal data for specified, explicit, and legitimate purposes and not further processing it in a manner that is incompatible with those purposes ('purpose limitation');
- Ensuring that personal data are adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- Ensuring that personal data are accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
- Ensuring that personal data are kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation');
- Ensuring that personal data are processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures ('integrity and confidentiality');
- Providing training and support for staff who handle personal data, so that they can act confidently and consistently;
- Responding appropriately when data subjects seek to exercise their statutory rights of access, correction, and objection.

### **IV. The Legal Basis for Processing Your Personal Data**

We process your Personal Data on the following legal bases:

- Your consent;
- A contractual relationship between us;
- Our legal obligations to which we are subject; and/or
- Our legitimate interests in ensuring the quality of our services, safeguarding the security and protection of our financial interests, managing risks, promoting information about our services and events, maintaining business relationships with clients, partners, and third parties, providing high-quality customer service, and understanding and improving how individuals use our Website.

We ensure that the processing of your Personal Data is limited to the specific purposes for which it was collected. Where the processing is based on your consent, you have the right to withdraw that consent at any time. However, please note that withdrawing consent may affect the provision of certain services, particularly where the collection and processing of your Personal Data are required by Data Protection law.

Access to your Personal Data will be restricted to personnel who require it to perform their professional duties and responsibilities to you as the Data Subject. Your Personal Data will not be stored or processed for longer than is necessary for the purposes outlined above.

We have implemented appropriate technical and organisational measures to ensure the secure processing of your Personal Data. Your Personal Data will be processed in a manner that ensures its confidentiality and integrity.

## **V. Types of Personal Data We Process, Purposes of Processing, and the Legal Grounds for Processing**

Depending on the services we provide, we may process the following types of your Personal Data:

Consent to Personal Data Processing : Personal data may be processed with the explicit consent of the data subject. Prior to providing consent, the data subject must be informed and accept the Privacy Policy by marking the statement "I agree with the Privacy Policy" or by providing consent in writing or electronically for documentation purposes.

Personal Data Processing for Business Relationships: Your Personal Data may be processed in order to establish, execute, and terminate a business relationship agreement. Prior to the agreement, during the initiation phase, personal data may be processed to prepare bids or purchase orders, fulfil other requests, and provide consultations related to the agreement's conclusion. Additionally, we may contact you during the agreement preparation process using the information you have provided. Any restrictions you request will be respected. We process the following Personal Data for this purpose: Name and Surname, Phone number, Email address, Identification document (e.g. Passport or ID Card), IP address, brief description.

Personal Data Processing for Marketing Purposes: We may send you information materials, updates, and event notifications related to our services, as well as information about upcoming events that may be of interest to you. Your Personal Data may be processed for marketing purposes or market and opinion research, provided that this is consistent with the purpose for which the data was initially collected. The data subject must be informed about the use of their Personal Data for marketing purposes and must provide their consent via email address or phone number.

If Personal Data is collected solely for marketing purposes, the disclosure by the data subject is voluntary, and the data subject must be informed that providing Personal Data for this purpose is not obligatory. Should the data subject withdraw consent for marketing purposes, their Personal Data will no longer be used for such purposes and will be blocked from further use. We process the following Personal Data for this purpose: Name and Surname, Email address, Phone number.

Personal Data Processing Pursuant to Legal Obligations: Personal Data may be processed where required by national legislation or when legally mandated. The types and extent of Personal Data

processing must be necessary for the legally authorised processing activity and must comply with the relevant statutory provisions and regulations.

Personal Data Processing Pursuant to Legitimate Interest: Personal Data may also be processed where necessary for a legitimate interest of Company. Legitimate interests may be legal (e.g. the collection of outstanding receivables, the assertion of legal rights in court proceedings, administrative or out-of-court procedures for the protection and enforcement of legal rights), commercial (e.g. avoiding breaches of agreements), or related to the improvement of our services.

Personal Data shall not be processed for the purposes of legitimate interest if, in specific cases, it is determined that the data subject's interests or fundamental rights override the legitimate interests of the data controller. Prior to processing Personal Data, we assess whether legitimate interests exist that justify processing Personal Data.

Personal Data Processing Using Cookies: We use cookies to collect information about your use of our Website. Cookies enable us to offer you a more efficient and user-friendly experience when using the Website. The information typically does not include data that would allow us to identify you as an individual. Personal Data collected via cookies will be processed for the duration of the period for which you have granted us consent. During your visits to our Website, we may automatically collect the following information:

- Technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Information about your visit, including the full Uniform Resource Locators (URLs) clickstream to, through, and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (e.g. scrolling, clicks, mouse-overs), and methods used to navigate away from the page.

Automated Decision-Making and Profiling: Automated processing of Personal Data (i.e. profiling), which is used to evaluate certain personal aspects of the data subject, such as the analysis or prediction of aspects related to behaviour, financial status, or performance, cannot solely be the basis for decisions that have significant legal consequences or could adversely affect the data subject. The data subject must be informed of the facts and the consequences of automated individual decisions and must be given the opportunity to respond. Based on the results of profiling, our employees may perform further monitoring or analysis of the data subject and make an individual decision. However, in certain circumstances, an offer to receive additional services or to amend cooperation conditions may be automatically generated and sent to a client.

Special Categories of Personal Data: The Data Protection Law recognise certain types of Personal Data as "sensitive" or "special category" data. This includes data about: a) Racial or ethnic origin; b) Religious or philosophical beliefs; c) Political opinions; d) Genetic or biometric data; e) Health-related data; f) Data related to criminal convictions and offences.

We do not actively seek to collect or process sensitive Personal Data. If, in the future, we are required to process such sensitive Personal Data due to changes in the purposes of processing, such processing will be conducted in compliance with the Data Protection Law principles.

Processing of Children’s Personal Data: Our services are not intended for children under the age of 18. We do not knowingly collect or process Personal Data from individuals under 18 years of age. If you are under 18 years of age, you should not provide Personal Data or information through our Website. If you are the parent or guardian of a child under 18 who you believe has provided Personal Data to us, please contact us immediately at [info@koinsky.com](mailto:info@koinsky.com), so we may delete and remove such data from our systems.

## **VI. Rights of the Data Subject**

You may at any time and at no cost request us to provide you information about your personal data that are processed by us, correction of any errors in your personal data, termination of processing of your personal data, or erasure of your personal data – subject to mandatory legal provisions or obligations to the contrary. In particular, if you qualify as the “data subject” under the terms of Data Protection Law, you have the right to:

Right of Access: You have the right to request access to any data that may be considered your Personal Data. This includes, for example, the right to be informed as to whether we process your Personal Data, what categories of Personal Data are being processed by us, and the purpose for which such processing is being undertaken.

Right to Rectification: You have the right to request that we correct any of your Personal Data if it is inaccurate or incomplete.

Right to Erasure: You may request that we erase your Personal Data, subject to certain statutory exceptions, if the Personal Data is no longer necessary for the purposes for which it was collected, or if you believe that the processing is unlawful, or if you believe that erasure is necessary in order for us to comply with a legal obligation.

Right to Object: You are entitled to object to certain types of Personal Data processing, including, for example, the processing of your Personal Data for marketing purposes or when we base our processing on legitimate interests.

Right to Data Portability: If we process your Personal Data based on your consent or a contractual relationship, you may request that we provide you with that Personal Data in a structured, commonly used, and machine-readable format. Furthermore, you may request that we transmit the Personal Data to another data controller, where technically feasible.

Right to Withdraw Consent: Where processing is based on your consent, you have the right to withdraw your consent to such processing at any time.

Right to Opt-Out from Marketing: We will provide you with the opportunity to opt out of our communications whenever we send you information about our services, events, or any other information we believe may be of interest to you. You can also opt out at any time by contacting us.

Limitations on Your Rights: In certain circumstances, statutory obligations may prevent us from disclosing or erasing your Personal Data. Additionally, such laws, regulations, or rules may prevent you from exercising other data subject rights.

If you have any complaints, questions or concerns regarding how we process your Personal Data, or if you would like further information about our Personal Data processing activities, please feel free to contact us at any time using the contact information provided below.

If you believe that your rights as a data subject have been violated or that your Personal Data is being processed incorrectly, and if cooperation with us cannot resolve the issue, you have the right to lodge a complaint with the relevant Data Protection Authority (“DPA”). For Cyprus, the DPA is the Commissioner for the Protection of Personal Data, which can be contacted via their website:

[https://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/home\\_en/home\\_en?opendocument](https://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/home_en/home_en?opendocument). You may lodge a complaint with the DPA in the jurisdiction where the alleged violation occurred, where the processing took place, or where you reside or work.

## **VII. Personal Data Transfers and Disclosures**

We may share your Personal Data with third-party service providers who act on behalf of Company as our data processors. We engage trusted third parties to assist in the operation of our website, conduct our business, or service our customers, provided that these parties agree to maintain the confidentiality of the information. We may also disclose Personal Data where such disclosure is deemed necessary to comply with legal obligations, enforce our policies, or protect the rights, property, or safety of Company, our customers, or others.

Where external companies process Personal Data on behalf of Company, we remain responsible for ensuring the security and proper use of that data.

### International Transfer of Personal Data

In certain circumstances, Company may transfer Personal Data to third countries outside of the European Economic Area (EEA). We are committed to ensuring that Personal Data is adequately protected regardless of where it resides. We provide appropriate safeguards to ensure the protection of Personal Data when such transfers occur. Personal Data may only be transferred outside the EEA where one of the following conditions applies:

- The data subject has provided explicit consent to the transfer.
- The transfer is necessary for the performance of a contract between the data subject and Company.
- The transfer is necessary for the conclusion of a contract between the data subject and Company.
- The transfer is necessary or legally required for important public interest grounds.
- The transfer is required in connection with the exercise or defence of legal proceedings, or obtaining legal advice.
- The transfer is necessary to protect the vital interests of the data subject.

In certain situations, the Data Protection Law permits the disclosure of Personal Data to law enforcement agencies without the consent of the data subject. Where such disclosure is required, we will ensure that the request is legitimate and in accordance with applicable legal requirements.

## **VIII. Security Measures and Technical Safeguards**

We implement appropriate administrative, technical, and organisational measures to ensure the physical and environmental security of your Personal Data. These measures include, but are not limited to, encryption of Personal Data, protection of computer networks, securing personal devices, data backup procedures, and other safeguards designed to protect your Personal Data from loss, theft, misuse, unauthorised access, disclosure, alteration, and destruction.

Access to your Personal Data is strictly limited to authorised personnel who require it to fulfil their work duties. These individuals process your Personal Data in compliance with the technical and organisational requirements set out in the General Data Protection Regulation (GDPR) and the Data Protection Law. We regularly audit and test our systems, provide training and instructions to our staff, and establish clear areas of responsibility in relation to the processing of Personal Data.

In the event that your Personal Data, in our possession or under our control, is compromised as a result of a security breach (such as accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access), we will take prompt and reasonable steps to mitigate the consequences of such a breach, to the extent that such actions are within our reasonable control.

## **IX. Personal Data Retention and Storage**

We will retain your Personal Data only for as long as is necessary to fulfil the purposes for which it was collected and processed.

Please be advised that, upon the expiration of the retention period or when the legal basis for processing has ceased, we may retain documents and materials containing Personal Data in our backup systems. Such Personal Data will be deleted at the conclusion of the backup retention cycle. During the backup period, and following the expiration of the retention period or cessation of the legal basis for processing, we ensure that appropriate safeguards are in place. The Personal Data will be rendered inaccessible in the backup systems, and it will be deleted as promptly as possible during our next scheduled deletion or destruction cycle.

As part of our data protection framework, we have established procedures to investigate any incidents related to the security of Personal Data. If necessary, these procedures include notifying the relevant authorities and individuals in accordance with applicable legal requirements.

## **X. Amendments to the Privacy Notice**

We may update this Privacy Notice to reflect changes in our data processing practices or in line with best practices in data protection. In the event of any amendments, the latest version of this Privacy Notice will be published on our Website. Where the changes are material, we will notify you accordingly. Your continued use of our Services following the publication of an amended Privacy Notice shall be deemed as your acceptance of the revised terms of this Privacy Notice.

## **XI. Contact Information**

If you have any questions or concerns regarding this Privacy Notice, please contact us at:

### **KOICONNECT LTD**

Company Number: HE464213

Address: Kallipoleos, 3, GEOGAS TOWER, Flat/Office 102, 1055, Nicosia, Cyprus

Email: [info@koinsky.com](mailto:info@koinsky.com)

Phone: +357 99 191044