# **Privacy Policy**

# GOOTOJECTS Plan. Build. Operate.

#### Introduction

Qooprojects is committed to safeguarding your personal information and maintaining transparency in how we process your data. This Privacy Policy outlines the types of personal data we collect, how we use and protect it, your rights and how you can contact us. We comply with the General Data Protection Regulation (GDPR) and relevant data protection laws in Cyprus and the European Union.

#### Personal Data We Collect

We only collect the personal information that is necessary for providing our services, improving your user experience and fulfilling legal or contractual obligations. This may include:

- **Identity and Contact Information:** Such as your full name, email address, phone number and company (if applicable), especially when you complete our contact form or communicate with us directly.
- **Inquiry and Interest Details:** Information related to the type of space or service you're interested in, including preferences regarding size, location, functionality, or timeframe.
- Communication Records: Details of your correspondence with us via email, contact forms, or social media messages. These may include any additional personal data you voluntarily provide.
- Website Analytics and Technical Data: We may collect anonymized website usage data
  via cookies and tracking technologies, including your IP address, browser type, pages
  visited, device type and referring site. This helps us optimize the performance and usability
  of our Site.

#### How We Use Your Personal Data

Your data is used only for legitimate business purposes and with your privacy in mind. We may use it to:

- Respond to your inquiries and requests effectively.
- Contact you with tailored information regarding available operational, office, or residential spaces.
- Confirm meeting arrangements, follow up on discussions, or provide updates.
- Send promotional content and updates, only if you've explicitly opted in.
- Analyze usage patterns on our website to enhance the user experience.
- Comply with applicable laws, regulations and obligations (e.g., accounting or tax requirements).
- Maintain internal administrative records and ensure business continuity.

# We do not sell, lease, or trade your personal information to third parties for marketing purposes.

# **Legal Grounds for Data Processing**

We rely on the following legal bases for processing your personal data:

- **Consent:** You have clearly agreed to the processing of your personal data for specific purposes, such as receiving newsletters.
- **Contractual Necessity:** To take steps at your request before entering into a contract or fulfilling an existing service arrangement.
- **Legitimate Interest:** For the operation and improvement of our services, as long as your rights and freedoms are not affected.
- **Legal Obligation:** Where processing is required by law or regulation.

# **Cookies and Tracking Technologies**

We use cookies and related technologies to enhance your interaction with our website:

- **Essential Cookies:** Required for core functionality such as security and navigation.
- Analytics Cookies: Help us understand website usage and improve services.

You can control cookies through your browser settings. Please note that disabling cookies may impact your ability to use certain parts of the Site.

## **Sharing of Personal Data**

We share your personal data only when necessary and only with trusted third parties who help us operate our business. These include:

- **IT and Infrastructure Providers:** Such as hosting companies, analytics providers, or email services, bound by confidentiality and data protection agreements.
- **Regulatory Authorities or Legal Entities:** Where disclosure is required to comply with a legal obligation or court order.

# **Data Retention**

We keep your personal data for no longer than necessary. The retention period depends on the nature of our interaction:

• **Initial Inquiries:** Typically retained for up to 12 months.

- **Client Communications and Services:** Retained for the duration of our relationship and up to 7 years thereafter, where legally required.
- **Marketing Data:** Retained until you withdraw your consent or unsubscribe.
- **Analytics Data:** Aggregated and anonymized usage data may be retained longer for analysis and reporting.

## Your Rights Under the GDPR

As a data subject, you have the following rights:

- **Right of Access:** Request a copy of the personal data we hold about you.
- **Right of Rectification:** Request correction of inaccurate or incomplete data.
- **Right to Erasure:** Request deletion of your data, under specific circumstances.
- **Right to Restriction:** Request a temporary halt to processing while your request is reviewed.
- **Right to Object:** Object to processing based on legitimate interests or for direct marketing.
- **Right to Data Portability:** Request your data in a machine-readable format to transmit to another controller.
- **Right to Withdraw Consent:** Withdraw your consent at any time, without affecting the legality of processing prior to withdrawal.
- **Right to Lodge a Complaint:** File a complaint with the Cyprus Commissioner for Personal Data Protection if you believe your rights have been infringed.

# Children's Privacy

Our services are intended for adults. We do not knowingly collect personal data from individuals under 14. If you believe a child has submitted personal information to us, please contact us so we can remove it.

#### **Security Measures**

We implement robust security protocols and practices to protect your personal data:

- Secure server connections (HTTPS/SSL).
- Role-based access control to sensitive systems.
- Regular updates and vulnerability monitoring.

Although we use industry-standard measures, no system is entirely immune to breaches. In the unlikely event of a breach, we will notify affected individuals and relevant authorities where required.

## **Contact Information**

If you have questions, requests, or concerns about this Privacy Policy or your personal data, you can contact us at:

• **Email:** info@qooprojects.com

We take data privacy seriously and aim to address all inquiries quickly and transparently.