



P A F O S
A P H R O D I T E
F E S T I V A L
C Y P R U S

P R O T E C T I O N P O L I C Y
O F P E R S O N A L D A T A

• **DATA CONFIDENTIALITY POLICY**

By entering the PAFOS APHRODITE FESTIVAL CYPRUS website your personal data is protected according to the GDPR requirements. Any process of your personal data is based on C.I.A. (confidentiality, integrity and availability). Any processing of your personal data is in accordance with the legal data protection regulations as well as with this Privacy Policy.

This policy reveals disclose how PAFOS APHRODITE FESTIVAL CYPRUS Process your personal data on the Internet, useful information about users that are logged in and how their P.D are used, shared or otherwise processed. We further describe how cookies and other technologies can be used in our applications.

By using our site you signify your consent to the collection and use of your personal data in the manner described in this Privacy Policy. we acknowledg that PAFOS APHRODITE FESTIVAL CYPRUS may change and regularly update this Privacy Policy at its sole discretion. In such a case, we will publish updates of this Privacy Policy on this site.

It is recommended that you carefully and regularly check this page for up-to-date information about the privacy policy.

PRIVACY POLICY STATEMENT FOR PROCESSING PERSONAL DATA

Within the framework of its activities, PAFOS APHRODITE FESTIVAL CYPRUS assures all interested parties and especially its clients that it has fully implemented the General Regulation for the Protection of Personal Data 2016/679.

Any personal data we collect from any Physical Person is processed in accordance with the Regulation but also with full respect for the rights of individuals. We are always collecting Personal Data that is absolutely necessary and consistent with the legal basis for which these Data have been collected. The personal data we collect is:

- According to the purpose for which they were originally collected
- Only the necessary and up-to-date

The protection of your personal data is within our core priorities and that is why we always seek to:

- Only be kept for as long as absolutely necessary
- Protected by appropriate and organizational security measures
- Regularly reviewed to take account of new technological developments
- Where possible to use encryption or pseudonymization instead of using actual data?

The above are implemented through an organized system designed to record and monitor the Personal Data from the beginning of their collection to the final recipient. The system is often controlled through documented internal audits, providing feedback to the PAFOS APHRODITE FESTIVAL CYPRUS administration and space for improvement.

At the same time, within the Privacy Policy, PAFOS APHRODITE FESTIVAL CYPRUS takes into account the rights of Physical Persons to whom it has received Personal Data in order to contribute to the empowerment of their rights as below:

The Right to be informed, the Right of Access, the Right of Correction, the Right of Removal "Right to Forgiveness", the Right of Limitation, the Right to Data Transferability, the Right of Opposition, and the Right to Objection to an Automated Decision including Profiling.

We commit ourselves to preventing any possible violations of the rights of individuals, but also to protect them in such a way that individuals rely on their Personal Data. The basic principles that govern the policy of PAFOS APHRODITE FESTIVAL CYPRUS are characterized by the confidentiality and confidentiality we hold, the preservation of the integrity, as well as their timely and the easy access and availability to the Physical Persons.

PAFOS APHRODITE FESTIVAL CYPRUS

Stella Shepipe

Director

Date: 4.2.2019

• **PURPOSE OF PROCESSING PERSONAL DATA**

PAFOS APHRODITE FESTIVAL CYPRUS uses and processes Personal Data of its customers in accordance with the protection policy it has issued

1. Process / Processing Activity:

The core activity through which Personal Data are processed is the Ticket Sale Online through its website.

2. Main or Secondary Activity:

The above activity carried out by PAFOS APHRODITE FESTIVAL CYPRUS is Primary.

3. The legal basis for processing:

PAFOS APHRODITE FESTIVAL CYPRUS processes Personal Data based on (6.1.b) which is the sale of the tickets, in order to protect the interests of its customers (6.1.b), i.e. if a show is postponed, the mobile phone will be required to be notified the clients for the new dates, and also Personal Data used to cover the legitimate interests pursued by the Controller (6.1.f).

4. Information of Data Processor

Every Data subject or individual has the right to contact us for any relevant questions or to exercise his or her rights with respect to his or her personal data.

Data Processor: PAFOS APHRODITE FESTIVAL CYPRUS

DIRECTOR P.A.F.C .: Stella Shepi

DPO: STELIOS SAKKAS

ADDRESS: Square 28th of October, PO. 60032 - 8100 Paphos

TELEPHONE / EMAIL: 26822218 / shepi.s@pafc.com.cy

5. Purpose of Processing

The purpose of the processing is the sale of tickets through the online software provided by PAFOS APHRODITE FESTIVAL CYPRUS Online

6. Categories of Underlying Data and Categories of Personal Data

The categories of individuals whose data they process can be Customers Individuals and / or Businesses.

From Physical Persons, Personal Data which the online software requests are:

Optional information: Name, surname, Country, City, area,

Required information: Email, Mobile

7. The Recipients Categories where Personal Data transferred are:

DW Dynamics Works Ltd - is the company that has "Developed the online software, and which supports and at the same time provides and hosts information stored by customers / users.

JCC Payment Systems Ltd - from which payments are made by credit card

And Logosnet Services Ltd – Logosnet has the appropriate infrastructure and premises where Personal Data are physically stored. Specifically **PAFOS APHRODITE FESTIVAL CYPRUS** clients Personal Data are located on DW Dynamics Works Ltd server at Logosnet Services premises.

8. Transmission of Data to a third country international organization

No transmission of Personal Data in a country outside the European Union is done.

9. Predicted Deletion Period

After 24 months if the Customer does not make a new purchase or does not validate his account through the system, then the system will automatically send to him/her notices for one-month to validate his Account or Delete. Specifically customers will receive 4 notifications within that current month. If he / she does validate his / her account, he / she will keep it for another 24 months. If not at the end of the month the system will delete that account. At the same time, at any time, it is possible through the system to allow the customer to delete his account on his / her own.

10. Technical and Organizational Safety Measures

The Data Controller and the Data Processors have implemented the GDPR Regulation and System in allignment with ISO27001 & ISO22301. At the same time, Encryption is being used on the Web site as well as the implementation of other Standards of Security, Organizational and Technical Measures by all involved parties.

11. Impact assessment / prior consultation

A risk assessment has been carried out for this activity and consultation and checks at regular intervals to improve the system.

12. GDPR awareness to the Data Subjects

The technical, the organizational and the security measures are functioning in such a way So as to server Physical Persons rights and enforce Data Protection of their Personal Data at any time.

• HOW WE USE THE COOKIES

Our online software uses cookies that are only necessary and for functional purposes of the system so that it can function and serve the users.

Below is a description of them:

Name	Type of Cookie
Cfid	Necessary
Cftoken	Necessary
site_user_flag	Functional
ecuser_su_id	Functional

• HOW WE SERVE THE RIGHTS OF PHYSICAL PERSONS:

If Personal Data are or will be processed and you are a Physical Person as defined by the General Privacy Policy you have the following rights as defined below.

You can claim your rights from the Data Controller at e-mail shepi.s@pafc.com.cy

As showed in the Charter below and through the Protection Regulation Personal Data Physical Persons have 8 basic rights like



These Physical Persons basic rights are described below:

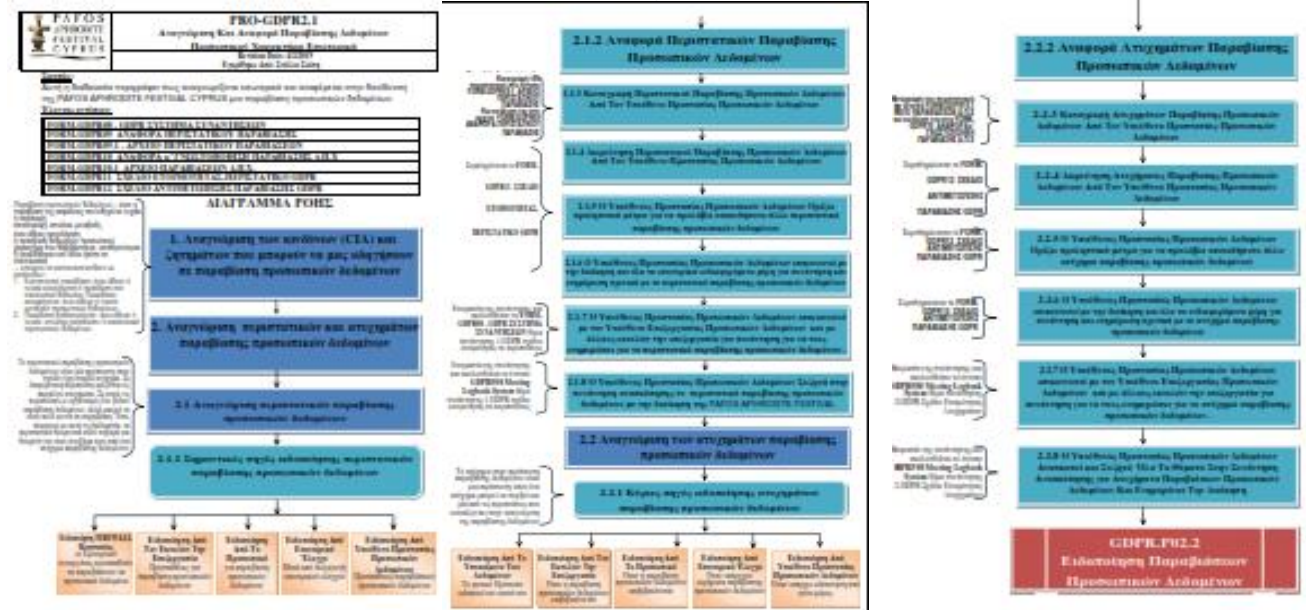
PHYSICAL PERSONS RIGHTS	HOW ARE BEEN SERVED
The Right to Information	PAFOS APHRODITE FESTIVAL CYPRUS has develop this Protection Policy Of Personal Data by which explain to clients and to any physical persons before becoming a clients how can exercise their rights and how they can contact the Data Controller.
the Right of access	The users can access to their account and personal data at any point of time through the system.
the Right of Correction	At any time, it is possible through the online software system to correct his or her own account and personal data.
the Right to Deletion "Right to be Forgotten"	After 24 months if the Customer does not make a new purchase or does not validate his account through the system, then the system will automatically send to him/her notices for one-month to validate his Account or Delete. Specifically customers will receive 4 notifications within that current month. If he / she does validate his / her account, he / she will keep it for another 24 months. If not at the end of the month the system will delete that account. At the same time, at any time, it is possible through the system to allow the customer to delete his account on his / her own.
the Right of Limitation	Technicians who have established the ticketing system in cooperation with the GDPR consultant and the Data Controller and its staff have manage to minimized the processing of Personal Data through the system. Essentially, only two fields are mandatory: 1. Email (because the customer will need it to create his/her account and validate it later on but also to control and keep it.) 2. The Mobile (in case where the client should be notified in the event of a change of appearance or even cancellation).
the right to data portability	The Physical persons will receive in his or her email that information that PAFOS APHRODITE FESTIVAL CYPRUS will process as a controller.
the Right of Objection	In the event that they give their consent to commercial communication, the client and / or the potential one may enter the system and override it. We also have the right to oppose the creation of the Profile and may be deleted at any time.
Right to object to an automated decision including profiling.	There are no automated decisions for customer profiling here. If this is done, the customer / user will be informed in advance.

• REPORTING OF DATA BREACH

Data breach means a breach of security resulting in accidental or unlawful destruction, loss or alteration, unauthorized disclosure or unauthorized access to personal data that is transmitted, stored, or otherwise processed by PAFOS APHRODITE FESTIVAL CYPRUS or a third party part.

Below are PAFOS APHRODITE FESTIVAL CYPRUS processes for reporting data breaches as part of an integrated GDPR compliance system:

PRO-GDPR2.1 Incident Identification & Recognition and Infringement Reporting Procedure



- **UNDERAGE PHYSICAL PERSONS**

People under the age of 16 should not transfer personal data without the consent of their parents or legal guardians. According to Article 8 (GDPR), children aged 16 or over can only sign such consents with the agreement of their parents or legal guardians. The personal data of minors is not collected and processed knowingly.

- **THE SAFETY AND VALIDITY OF THIS DATA-CONFIDENTIAL POLICY**

PAFOS APHRODITE FESTIVAL CYPRUS reserves the right to adapt this Privacy Policy at any time and with effect for the future. Therefore, it is recommended that you read this Privacy Policy at regular intervals.

Updated 04 / March / 2019