

# PRIVACY POLICY

Effective date: May 21, 2019

As of 25 May 2018, the EU General Data Protection Regulation 2016/679 (known as GDPR) will be enforced for the protection of natural persons against the processing of personal data and the free circulation of them. The GDPR shall replace the Directive 95/46/EU which was applied by law 138(I)/2001 and was designed to harmonize data privacy laws across Europe, to protect and empower all EU citizens data privacy and to reshape the way organizations across the region approach data privacy.

NEXTGEN (“us”, “we” and “our”) is the data controller of your personal data and is subject to the EU General Data Protection Regulation 2016/679.

We, NEXTGEN, as service providers are obliged to secure our clients and any other third parties such as employees, contractors, principals and any other party related to us, personal data which in any way came to our possession.

More information may be obtained from the European Commission’s relevant website here and from the official Cyprus Government portal at [www.dataprotection.gov.cy](http://www.dataprotection.gov.cy).

## **Based on the GDP Regulation, any physical person has the following rights:**

- To have access to the personal data and information which we possess and ask for a copy;
- To ask from us to correct the personal data we hold about you, if this is incorrect;
- To require us to delete your personal data from our records;
- To require us to restrict our personal processing activities related to your personal data;
- To require us not to send marketing communications to you;
- To receive from us the personal data we hold about you, in a reasonable format specified by you, including the purpose of transmitting of your personal data from us to another data controller.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. Should any law require the keeping and maintenance of certain data for a longer period of time we undertake to arbitrarily or on your request remove from our data system upon the lapse of the period provided by the GDPR, data relating to you which may be irrelevant or unnecessary for keeping for the purposes of compliance with any such law/s or regulation/s.

## **The contact details for our Privacy and Data Protection Officer (DPO) are:**

Name: Mr. Christoforos Psyllides.

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

Tel: +357 25 260081

Any complaints you may have with regards to any violation of your rights under the GDPR may be lodged with the relevant supervisory authority whose details are as follows:

Officer of the Commissioner on Personal Data Protection 1, Iasonos Str., 1082 Nicosia  
P.O.Box 23378, 1682 Nicosia Tel: +357 22818456, Fax: +357 22304565

Email: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)

Website: <http://www.dataprotection.gov.cy>

## **Definitions**

### **Personal Data**

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

### **Usage Data**

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

### **Cookies**

Cookies are small pieces of data stored on a User's device.

### **Data Controller**

Data Controller means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your data.

### **Data Processor (or Service Providers)**

Data Processor (or Service Provider) means any person (other than an employee of the Data Controller) who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

### **Data Subject**

Data Subject is any living individual who is the subject of Personal Data.

## **User**

The User is the individual using our Service. The User corresponds to the Data Subject, who is the subject of Personal Data.

## **Information Collection And Use**

We collect several different types of information for various purposes to provide and improve our Service to you.

## **Types of Data Collected**

### **Personal Data**

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you (“Personal Data”). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us.

### **Usage Data**

We may also collect information how the Service is accessed and used (“Usage Data”). This Usage Data may include information such as your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

### **Tracking & Cookies Data**

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

## Use of Data

**NEXTGEN is collecting your data in numerous ways including, but not limited to, the below:**

- From information provided by you when we meet you in person;
- From information given to us by you via telephone, email, fax or other forms of electronic communication. In this respect, we may monitor, record and store any such communication and/or information shared with us;
- When you or your authorized representative is completing and signing our application or other forms to request our services;
- From publicly available sources or from third parties when we need to conduct background checks about you;
- When you sign agreements, which are entered between yourself and NEXTGEN.

**Categories of Personal Data we collect:**

- Name and any contact information we consider necessary (email, address, telephone etc);
- Any necessary biographical information which will confirm your identity (passport, ID, nationality, place and date of birth etc);
- Information related to your financial situation such as income, expenditure, assets, source of funds, value of wealth, bank account details and anything else we find it proper to be requested;
- Information related to your knowledge and experience in the relevant field;
- Understanding of your goals and objectives in procuring our services;
- Information about your personal circumstances, marital status, family, education, employment and any other relevant information.

**How we use your personal data, other than your concern:**

We process your personal data because it is necessary for the performance of an agreement to which you are a party or in order to take steps at your request prior to entering into this agreement. We use them also for our legitimate interests or where it's necessary for the legitimate interest of another person. Finally, we use them for our compliance for which we are under legal obligation.

In this respect, we use your personal data for the following:

- To prepare a proposal for you regarding our services;

- To provide you with the services as set out in our agreement with you or the application forms you have completed and signed as otherwise agreed with you from time to time;
- For any other purpose for which you provide us with your personal data, and we consider proper that they need to be used;
- For marketing to you;
- For the administration and management of our business;
- To meet our compliance and regulatory obligations (compliance with anti-money laundering laws, etc);
- As required by tax authorities, courts or any other legal authority.

In this respect, we may share your personal data with or transfer it to the following:

- Your agents, advisers, intermediaries, and custodians of your assets who you tell us about;
- Third parties whom we engage to assist in delivering the services to you, including other companies of NEXTGEN, associates of NEXTGEN, agents, accountants, lawyers, auditors etc.;
- Third parties who assist us in conducting background checks;
- Our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, IT or public relations advisers in order to assist you;
- Other third parties such as intermediaries who we introduce to you. We will wherever possible tell you who they are before we introduce you;
- Our data storage providers.

## **Marketing material**

We will send you marketing material related to services we provide, as well as other information in the form of alerts, newsletters and invitations to events or functions which we believe might be of interest to you.

We will communicate this to you in several ways including by post, telephone, email, SMS or other digital channels.

If you object to receiving marketing from us at any time, please contact us:

Via email: [info@nextgency.com](mailto:info@nextgency.com) or telephone: +357 25 260081

If you should wish to have your name and address removed from our specific purposes mailing list, you should provide us with clear Instructions in this respect. However, in such a case we shall not be held liable and you hereby relieve us of any liability with respect to any information of essence which may not reach you.

## **Service Providers**

We may employ third party companies and individuals to facilitate our Service (“Service Providers”), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## **Analytics**

We may use third-party Service Providers to monitor and analyze the use of our Service.

- **Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>

## **Behavioral Remarketing**

NEXTHEN uses remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service.

- **Google AdWords**

Google AdWords remarketing service is provided by Google Inc.

You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on – <https://tools.google.com/dlpage/gaoptout> – for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>

You can learn more about the privacy practices and policies of Twitter by visiting their Privacy Policy page: <https://twitter.com/privacy>

- **Facebook**

Facebook remarketing service is provided by Facebook Inc.

You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>

To opt-out from Facebook's interest-based ads follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>

Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings.

For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

### **Links To Other Sites**

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

### **Children's Privacy**

Our Service does not address anyone under the age of 13 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

### **Changes To This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

### **Contact Us**

If you have any questions about this Privacy Policy, please contact us:

- By email: [info@nextgency.com](mailto:info@nextgency.com)