

CUSTOMER PRIVACY POLICY (GDPR)

Cyprus Telecommunications Authority Cyta

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1. INTRODUCTION

The Cyprus Telecommunications Authority (Cyta) is committed to safeguarding the privacy of its customers. This Privacy Policy describes the information and Personal Data that Cyta collects, uses and processes in relation to its customers and/or users of its services, as well as the manner in which such Personal Data are used in the course of Cyta's operations.

2. DEFINITIONS

"Controller" means the natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its appointment may be provided for by Union or Member State law.

"Personal Data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is a person whose identity can be established, directly or indirectly, in particular by reference to an identifier, such as name, ID number, location data, online identifier, or one or more factors that form the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

"Processing" means any operation or set of operations which is performed, whether by automated means or not, on personal data or on sets of personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

"Processor" means the natural or legal person, public authority, agency or other body that processes personal data on behalf of the controller.

3. CUSTOMER DATA

Cyta and its resellers collect customer data for the purposes of providing and operating electronic communications services and/or products ordered by the customer. Customer data includes name, address, phone number(s),

ID/passport number, date of birth, contact details, email (if applicable), bank account details for automatic payments (if applicable), billing address, credit check results for the purpose of a possible customer guarantee payment (natural person), guarantor details, service charges, payment history, and the customer's preference regarding inclusion in Cyta's telephone directory database.

The above data will be kept by Cyta for the duration of the customer's contract for the purpose of managing the customer's services and products, billing, handling of complaints, requests and enquiries or for the purposes of managing telecommunications fraud issues.

The following data shall not be deleted:

(a) Data retained by order of the Court.

(b) Data kept for the purposes of tax legislation (Law 95(I)/2000 and Law 4/1978), which shall be kept for a period of six (6) years.

(c) Data processed for the purpose of satisfying a legitimate interest (e.g. a claim against a customer), which shall be kept until the purpose has been fulfilled.

(d) Data on payments made by SEPA Direct Debit and data on the corresponding paid invoices, which shall be retained for a period of thirteen (13) months in accordance with the SEPA rules.

If a customer chooses to enter into a remote contract with Cyta, he/she will be asked to proceed with digital identification through an authorized Cyta partner. In this case, the customer will be asked to submit his/her identification documents and photograph, copies of which will be kept only until the identification process is completed.

4. TRAFFIC AND BILLING DATA

Cyta processes traffic and billing data for the purposes of providing telecommunications services and products to its customers, for billing purposes and for recommending discounts, loyalty, reward or benefit schemes and programmes for such services and products, or to comply with Cyta's legal obligations. This data includes all calls, location data, date, time and duration of the call, network faults, IP address, email address, web

traffic, customer's use of applications and facilities. In addition, Cyta will take all necessary measures to protect the confidentiality, integrity and availability of its network and services, such as protection against telecommunications fraud, spam, security threats, attacks, viruses and/or abnormally high usage, etc.

Traffic and billing data will be retained by Cyta for a period of six (6) months as defined by law. At the end of the six-month period, this data will be deleted.

The following data shall not be deleted:

(a) Data retained for the purpose of criminal investigations pursuant to a Court order.

(b) Data processed for the purpose of satisfying a legitimate interest (e.g. litigation against a customer), which shall be kept until the purpose is fulfilled.

Cyta does not record or monitor the content of customers' telephone calls or text messages.

In the event that a customer contacts Cyta by telephone or Cyta contacts a customer by telephone, the conversations with the customer are recorded in accordance with Law 24 (I)/2022 for the sole purpose of proving the commercial transaction. Such recorded conversations shall be kept for a period of five (5) years or, in the case of litigation, until the end of the litigation.

5. MARKETING

Cyta uses customer data, as well as traffic and billing data, for the purposes of communication and promotion of:

(a) Cyta's products and services (including discounts, contests or special promotions that may be of interest to the customer), similar to those already ordered by the customer, with automated profiling.

(b) Personalized offers and recommendations based on the use of services and products by the customer, e.g., based on data, calls and messages, location or web traffic, using automated profiling.

(c) Third party services and products (including offers, discounts and/or social events organized by Cyta for its customers), where the customer has consented to be informed about them.

Such promotions may take the form of phone calls, letters, faxes, text messages, multimedia messages, videos, e-mails or applications.

Cyta customers may opt out of receiving marketing materials from Cyta or have their information not included in automated profiles or personalized offers and recommendations by visiting the Privacy Policy Settings page on Cyta website or using any of the opt-out methods provided by Cyta. In case of a multi-line account, the customer shall specify his/her opt-out choice for each line. If the customer adds a new line or changes his/her telephone number, he/she should update the privacy settings.

In addition, customers may separately withdraw their consent to receive marketing materials from third parties, either by visiting the Privacy Policy Settings page on Cyta website, or through promotions, or at a Cytashop.

6. CYTAVISION TV DATA

Cyta processes information regarding the use of the Cytavision service by its customers. This information includes the channel package used, the number of devices used by the customer from the Cytavision software applications, the television programmes watched and the Video on Demand and Pay per View purchased. This information is used to manage the Cytavision service, for billing purposes and to make viewing recommendations to customers for existing or new Cytavision content, including television programs, channels or movies.

In addition, Cyta stores customer pin codes for the purpose of implementing adult blocking or authorizing the purchases of content.

Cytavision customers are required to maintain the confidentiality of their codes and to notify Cyta immediately of any loss of their codes.

7. MOBILE AND INTERNET APPLICATIONS

Cyta customers or users who download any mobile or Internet application ("applications") are asked to verify their account details (where required). In

this case, Cyta will process their data usage, their IP numbers, the websites they have visited (where applicable) and the amount they have spent for billing purposes. In addition, where a mobile or Internet application creates a customer's preferences profile, customers will be informed of the profile prior to downloading the application and will have the right to opt out of future profiling.

Along with this Privacy Policy, specific privacy settings may apply, which are contained in the information pages of each Cyta application and on the relevant Cyta website.

Cyta uses customer personal information (including access to information on a device), such as information about the application being used, the duration of the application's use, its functionality, etc., for the purposes of smooth functioning of the applications and in order to reduce the number of errors and disruptions.

8. COOKIES POLICY

Cyta's websites use cookies (small text files stored on a device) to collect information about browsing preferences and applications in order to present you with advertisements or similar products or services, or to provide you with a better experience when interacting with Cyta's services and products.

The browsing preferences are anonymous and are shared with Cyta partners with whom Cyta has a contractual relationship.

Cyta's websites provide to the users settings for accepting or rejecting cookies.

9. GENERAL CUSTOMER RIGHTS IN ACCORDANCE WITH EUROPEAN REGULATION 2016/679 ("GDPR")

9.1 Right of Access

Customers can find out in more detail about the Personal Data Cyta processes about them on the Cyta website www.cyta.com.cy or by submitting a request to any Cytashop.

The right of access is governed by the provisions of the applicable Personal Data Protection legislation and requires the prior authentication of the legal subscriber.

9.2 Right to Erasure ("Right to be Forgotten")

Customers may request the deletion of their personal data that is no longer useful for Cyta's purposes by visiting CYTA's website www.cyta.com.cy or by submitting a request to any Cytashop. The right to erasure is governed by the provisions of the applicable Personal Data Protection legislation and requires the prior authentication of the legal subscriber.

9.3 Data Portability

Customers may exercise their right to data portability by submitting a request to any Cytashop. Data portability is governed by the provisions of the applicable Personal Data Protection legislation and requires the prior authentication of the legal subscriber.

9.4 Right to Update, Rectify or Restrict the Processing of Personal Data

Customers may update their Personal Data or request the correction of any incomplete Personal Data or the restriction of the processing of their Personal Data by submitting a request to any Cytashop. These rights are governed by the provisions of the applicable Personal Data Protection legislation and require the prior authentication of the legal subscriber.

9.5 Right to Object

Customers have the right to object to the processing of Personal Data concerning them, including automated profiling, by visiting the Cyta website www.cyta.com.cy or by submitting a request to any Cytashop. The right to object is governed by the provisions of the applicable Personal Data Protection legislation and requires the prior authentication of the legal subscriber.

10. CHILDREN AND PERSONAL DATA

Cyta encourages parents to inform themselves about the child protection services **(safe internet for home and safe mobile)** and to inform Cyta if they do not want a child under the age of 16 who is a user of Cyta services to receive

promotional materials from Cyta or third parties (for more information, visit any Cytashop or Cyta's website, www.cyta.com.cy).

11. INFORMATION AND NETWORK SECURITY PROTECTION MEASURES

Cyta maintains extensive information and network security measures and procedures to protect Personal Data in accordance with its legal and regulatory obligations.

In this context, it has adopted a comprehensive approach to information security to ensure the confidentiality, integrity and availability of customers' Personal Data. Cyta has a corporate Information Security Management System (ISMS) in accordance with the International Standards ISO 27001 and ISO 27002. The ISMS system includes the implementation of corporate security policies and procedures and covers issues such as corporate governance, security controls, document protection, secure information management, operations and communications, personnel security, physical security, controlled access to information systems, incident management, etc.

Cyta has the necessary technical and organizational measures in place to protect itself effectively against cyber-attacks and other cybersecurity risks, as well as a Security Operation Center (SOC) that monitors its networks and services and deals with security incidents on a 24-hour basis.

12. BUSINESS PRODUCTS AND CONFIDENTIALITY

Personal Data is associated with a natural person. However, some of Cyta's business products designed for business customers (companies, businesses, public authorities, government services, etc.), such as cloud services, may contractually (through the service terms and conditions) give Cyta the right to undertake the storage and/or processing of Personal Data of natural persons on behalf of the business customer and upon the business customer's written instructions. In such a case, the business customer remains the Data Controller of its Personal Data and Cyta acts only as a Processor of such data. As a Processor, Cyta is obliged to maintain the confidentiality of the Personal Data based on the instructions of the business customer, the terms and conditions of the service ordered and Cyta's security policy.

13. PERIOD OF STORAGE OF PERSONAL DATA

Cyta stores the Personal Data of its customers for as long as required by applicable legislation and/or for the duration of the customer's contract.

Certain Personal Data may also be stored after the termination of the customer's contract in accordance with the applicable legislation (see paragraph 2 above).

14. DEBT COLLECTION AGENTS

In the event of unpaid invoices, Cyta may contact its customers through its debt collection agents (natural persons or debt collection companies) in an attempt to have these invoices settled out of court. In such a case, Cyta will provide the debt collection agents only with the necessary information about its customers, such as name, address, ID number and the amount due. Cyta's debt collection agents are bound by a confidentiality obligation.

15. TRANSFERS OUTSIDE THE EUROPEAN UNION AND/OR THE EUROPEAN ECONOMIC AREA

Customers are informed that some of Cyta's suppliers, subcontractors and partners are located outside the EU and/or EEA. These partners are contractually bound to Cyta, with appropriate data transfer tools enabling to provide the necessary security safeguards, to maintain the confidentiality of Cyta's data and Customers` Personal Data; they are subject to the obligations of the General Regulation 2016/679 (Articles 44 and 45).

16. CYTA CONTACT DETAILS /COMPLAINTS

Customers may contact Cyta for any information regarding the Privacy Policy at 132, on the website www.cyta.com.cy or by post to Telecommunications Street (Tilepikoinonion), P.O. Box 24929, CY-1396, Nicosia, Cyprus. To receive information or to make a complaint, they may contact Cyta at www.cyta.com.cy/contact-form or dpo@cyta.com.cy.