

# **PRIVACY POLICY**



# **XHUB PRIVACY POLICY**

#### 1. Overview

This Privacy Notice outlines the data protection policies of **XHUB LTD**, a private limited liability company registered and existing under the laws of the Republic of Cyprus, with registration number HE 458522 ("we" or the "Organization/Association"), in line with the EU General Data Protection Regulation ("GDPR") and the laws of the Republic of Cyprus. For inquiries or requests, please contact us at <u>officer@xhubcy.com</u>.

XHUB LTD, as the data controller, is committed to transparency and adherence to data protection laws. This Privacy Notice addresses the collection and processing of personal data related to membership applications.

#### 2. Personal Data Collection

We collect and process personal data, including but not limited to:

#### 2.1. Information Supplied by You

This includes data directly provided by you and information provided by individuals connected to you, your business, or those representing you. When registering with XHUB LTD, you may provide personal data by filling out registration forms, submitting required documents for service provision, and similar activities.

- Company name
- Job title
- Official company documentation (Certificate of Incorporation, Certificate of Shareholder, Certificate of Directors and Secretary)
- Full name
- Email address and telephone number

The processing is carried out to assess membership applications, manage registered members, and facilitate communication within XHUB LTD.

#### 2.2. Automatically Collected Data

This regards information collected concerning your engagement with our services and account related activities.

- Information concerning your website usage (obtained using cookies and similar technologies).
- Inquiries made through our registration system or social media accounts.



### 3. Special Category Data

We may collect "Special Category Data" with explicit consent, ensuring compliance with relevant regulations.

#### 4. Purpose of Data Processing

Data processing is essential for assessing applications, effective registration, maintaining member records, and complying with legal obligations. We use legitimate interests to manage the registration process. You have the right to refrain from providing certain information to us, such as details requested in the registration form. However, exercising this choice may have consequences. It could hinder your ability to complete registration on our website or access our services. Additionally, it might affect our capacity to administer our services.

### 5. Data Security and Third-Party Involvement

We prioritize data security, with internal policies and controls to prevent loss, destruction, misuse, or unauthorized access. Currently, we do not use third-party services for personal data storage. Any potential collaboration will involve Data Processing Agreements to ensure compliance with GDPR.

#### 6. Rights of Data Subjects

Individuals in the European Union (or equivalent jurisdictions) have rights regarding their personal data under the GDPR or similar laws. To exercise these rights (including consent withdrawal, data access, correction, erasure, data restriction, third-party data provision, objection, or data portability), please send a request to <u>officer@xhubcy.com</u>.

We may request additional details to validate your identity, and we aim to respond within 30 days. A reasonable fee may be charged for associated expenses. Choosing not to provide personal data or limiting data processing may impact the provision of our services.

## 7. Data Retention

We adhere to the Data Retention Policy, retaining personal data during membership. Afterward, we will delete the data, unless legal obligations mandate information retention for tax reasons or potential pre-trial investigations. However, the retention duration will not surpass 5 years following the conclusion of your membership. At the conclusion of this timeframe, the data will be permanently removed. Requests for information or data destruction should be directed to <u>officer@xhubcy.com</u>.

#### 8. Changes to Privacy Notice

This Privacy Notice is regularly reviewed, and updates are circulated internally. Last updated on 26/02/2024.



### 9. Complaints Procedure

For inquiries or complaints, contact our Data Protection Officer at officer@xhubcy.com.

Unsatisfied individuals can lodge a complaint with the Office of the Commissioner for Personal Data Protection:

1 Iasonos Str., 1082 Nicosia, P.O. Box 23378, 1682 Nicosia Tel: +357 22818456 Fax: +357 22304565 Email: <u>commissioner@dataprotection.gov.cy</u>