

PRIVACY POLICY

This notice describes the privacy policy (“Privacy Policy” or “Policy”) of <https://accyp.com/>, and/or its related mobile application, “ACC CY”, as available on **Google Play Store** and **Apple App Store** (hereinafter referred to as the “website” or “app”) which is operated by:

Company Name: A & C Christofi Ltd

Registered Office: 37 Nicou and Despinas Pattichi Avenue Evi Court 3rd Floor, Offices 302-303 Limassol CY - 3071
Cyprus

(hereinafter referred to the “Company” or “ACC CY” or “us” or “our” or “we”). In this Policy, you shall be referred to as “you” or “your” or “user(s)”.

Your privacy is of paramount importance to us. This Privacy Policy outlines our practices regarding the collection, use, and disclosure of your information through your use of our website and app. We are committed to protecting the privacy and security of the personal information of our clients and website visitors. This policy is designed to inform you about how we handle your personal data, the types of information we collect, how it is processed, and for what purposes. The use of information collected through our App/website shall be limited to the purposes described under this Privacy Policy and our Terms & Conditions.

By using our App, website or availing our services or providing your personal information to us, you are accepting and consenting to the practices described in this policy. Please note that this includes consenting to the processing of any personal information that you provide, as described below.

IF YOU DO NOT AGREE WITH THESE PRACTICES, PLEASE DO NOT USE THE SERVICES OR THE APP OR WEBSITE OR PROVIDE US WITH ANY OF YOUR PERSONAL INFORMATION.

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1. What information about the users do we collect?

At ACC CY, we are committed to protecting your privacy and ensuring a safe and enjoyable user experience. To provide our services, we may collect and process the following types of information:

a) **Personal Identification Information (PII):**

- i. **Name and Contact Information:** We collect your full name, email address, telephone number, and any other contact details you choose to provide. This information is typically gathered when you fill out contact forms, register for services, or communicate with us.
- ii. **Appointment Details:** For users booking appointments through our website or app, we collect information related to the appointment, such as the service requested.

b) **Financial Information:** For clients who opt for online payments for our services, we collect necessary financial data, including credit card numbers, security codes, and billing addresses, to process transactions securely.

c) **Usage Data:** We automatically collect data on how you access and use our platforms, including your IP address, browser type, browser version, our website and app pages that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers, and other diagnostic data.

d) **Communication Data:** Any communications between you and ACC CY, including emails, phone calls, or messages sent through our website or app, may be collected to help resolve any issues you might be facing and to provide you with support.

2. What is the lawful basis for which we use your personal information?

You hereby acknowledge that all processing of your personal information will be justified by a *"lawful ground"* for processing. In most cases, processing will be justified on the basis that:

- a) **Consent:** We may process your data if you have given us explicit permission to use your personal information for a specific purpose. For example, when you subscribe to our newsletter, fill out a contact form, or agree to cookies on our website.
- b) **Performance of a contract:** We process personal information as necessary to fulfill our contractual obligations to you. For instance, when you avail of our services, we will use your information to carry out our service delivery, billing, and to provide customer support.
- c) **Legal obligations:** We may use your personal information to comply with a legal obligation, such as maintaining records for tax purposes or providing information to a public body or law enforcement agency.
- d) **Legitimate interests:** We process your information when it is in our legitimate interests to do so and when these interests are not overridden by your data protection rights. This includes providing and improving our

services, administrative purposes, and protecting our business interests. For example, we use your usage data to improve our website and app's functionality and your user experience.

In any case, we will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract. Feel free to contact us for this purpose at info@accyp.com.

3. How do we use this information?

At ACC CY, we utilize the information we collect for various purposes aimed at enhancing your user experience and providing you with our services. The ways in which we use this information include:

- a) **Service Delivery:** To perform and manage the services you have requested or contracted us for, including accounting, auditing, and advisory services.
- b) **Appointments and Inquiries:** To schedule appointments, respond to inquiries, and provide customer support.
- c) **Updates and Announcements:** To send you important information regarding our site and app, changes to our terms, conditions, and policies, or other administrative information.
- d) **Marketing and Promotions:** With your consent, to provide you with updates on new services, offers, promotions, and events we think may interest you.
- e) **Personalization:** To personalize your experience on our platforms based on your previous interactions and preferences.
- f) **Analytics and Performance Improvement:** To monitor and analyze usage and trends to improve our website and app's functionality and user interface.
- g) **Protection:** To ensure the security of our website and app, prevent fraud and unauthorized access, and verify your identity where necessary.
- h) **Legal Compliance:** To comply with legal and regulatory obligations, including financial reporting, and to respond to requests from public and governmental authorities.
- i) **Terms and Conditions Enforcement:** To enforce our terms, conditions, and policies for business purposes, to comply with legal and regulatory requirements, and to protect our business.
- j) **Feedback Utilization:** To solicit feedback to improve our services and products, and to develop new features and offerings.

4. How can you delete your information and account?

Your information, account, and the content that you share on our website and App is yours. You can at any time delete the same. However, you acknowledge that we may retain some of the information so deleted for a reasonable period in order to comply with legal requests. You can request us to delete your information by writing to us at info@accyp.com.

5. Cookies and Similar Technologies

Cookies are bits of electronic information that a website may transfer to a visitor's computer to identify specific information about the visitor's visits to other websites. We may use automated technologies including the use of web server logs to collect IP addresses, device details, cookies, and web beacons. The website uses a browser feature known

as a cookie, which assigns a unique identification to your computer. However, in case you do not wish for us to collect such information, simply change the cookie settings on your web browser. For more information, please refer to the **Cookie Policy** posted on our website.

6. Who do we share your information with?

ACC CY takes your privacy seriously and strives to ensure that your personal information is treated with care and respect. We may share your information in the following circumstances:

- a) **Third-party Service Providers:** We engage various third-party service providers to perform functions and provide services to our company, such as website hosting, maintenance, payment processing, data analysis, email delivery, and auditing services. These service providers have access to personal information needed to perform their functions but are contractually obligated to protect your information and use it only for the purposes for which it was disclosed.
- b) **Legal Obligations:** In certain situations, ACC CY may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may also share information to comply with a judicial proceeding, court order, or legal process served on our website or app.
- c) **Business Transfers:** In the event of a merger, acquisition, or sale of all or a portion of our assets, your information may be transferred to the acquiring entity as part of the transaction. We will notify you of such transfers and any changes to our privacy practices.
- d) **Aggregated Data:** We may share aggregated and anonymized data that cannot be used to identify individuals. This information is used for analytical and research purposes.
- e) **With Your Consent:** If you provide explicit consent, we may share your data for other specific purposes. You have the option to opt in or opt out of such activities.
- f) **Third-party Links:** ACC CY may contain links to third-party websites or services. We are not responsible for the privacy practices or the content of these third-party sites. You should review the privacy policies of these third parties to understand how they collect and use your information.

It's important to emphasize that ACC CY does not sell or rent your personal information to third parties. We take all necessary steps to safeguard your privacy and security. Please be aware that when you engage in user-to-user interactions, your information is shared with those users as part of the intended platform functionality.

7. Storage and Security of Information

At ACC CY, we prioritize the security and integrity of your personal information. We implement robust measures to protect your data and ensure its safe storage. Here's how we handle this crucial aspect.

- a) **Hosting Services:** Your data is stored on secure servers provided by our hosting service provider, IONOS. IONOS is known for its high standards of security and data protection practices, ensuring that your information is safeguarded.

- b) **Local Servers:** In addition to our hosting provider, we also store information on secure local servers. These servers are maintained in accordance with strict security protocols and are located in secure facilities with restricted access.
- c) **Access Control:** Access to your data is restricted to authorized personnel who require such access to fulfill their responsibilities. All individuals with access to user data are bound by strict confidentiality agreements.
- d) **Encryption:** We use encryption protocols to protect your data during transmission over the internet. This helps ensure that your information is secure when communicating with our platform.
- e) **Data Retention:** We retain your information for as long as necessary to provide our services, comply with legal obligations, resolve disputes, and enforce our policies. Once data is no longer required for these purposes, it is securely deleted or anonymized.
- f) **Security Measures:** Our security measures include firewalls, intrusion detection, and continuous monitoring to identify and respond to potential threats. We employ routine security assessments to strengthen our defenses.
- g) **User Authentication:** We use industry-standard authentication and authorization practices to confirm the identity of users and restrict unauthorized access to accounts.
- h) **Password Protection:** We encourage strong password practices, including password complexity and periodic password updates, to enhance the security of user accounts.
- i) **Training and Awareness:** Our team is educated on security best practices and data protection. We continuously monitor and update our procedures to respond to evolving security threats.

While we implement stringent security measures, it's important to remember that no method of data transmission over the internet or electronic storage can be completely foolproof. We continuously work to improve our security practices and remain dedicated to protecting your information.

8. Links to other Sites

The website and App may contain links to third-party websites and online services that are not owned or controlled by us. We have no control over, and assume no responsibility for such websites and online services. Be aware when you leave the website; we suggest you read the terms and privacy policy of each third-party website, and online service that you visit.

9. Rights of Cyprus, EU, EEA, and UK users

This section of the Policy supplements the other provisions of this Privacy Policy, and applies to you if you are in the Cyprus, EU, the European Economic Area (EEA) or UK. Cyprus is a member of the European Union and its data privacy law is regulated by the EU's General Data Protection Regulation (GDPR) which came into effect in May 2018.

For the purposes of GDPR, your **DATA CONTROLLER** is:

Company Name: A & C Christofi Ltd

Registered Office: 37 Nicou and Despinas Pattichi Avenue Evi Court 3rd Floor, Offices 302-303 Limassol CY - 3071
Cyprus

ALL YOUR USER INFORMATION WILL BE COLLECTED, STORED, PROCESSED AND SHARED STRICTLY IN ACCORDANCE, IN LINE AND FULL COMPLIANCE WITH REGULATION (EU) 2016/679 (SIMPLY CALLED “GDPR”), DIRECTIVE 2002/58/EC (SIMPLY CALLED “E-PRIVACY DIRECTIVE, 2002”) OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL, AND UK’S DATA PROTECTION ACT 2018 (HEREINAFTER COLLECTIVELY REFERRED TO AS THE “UK GDPR”).

Under applicable GDPR, you have the following rights in respect of your personal information:

- **Right to obtain information:** to obtain information about how and on what basis your personal information is processed and to obtain a copy;
- **Right to rectification:** You have the right to have any incomplete or inaccurate information we hold about you rectified and corrected.
- **Right of Erasure:** to erase your personal information in limited circumstances where (a) you believe that it is no longer necessary for us to hold your personal information; (b) we are processing your personal information on the basis of legitimate interests and you object to such processing, and we cannot demonstrate an overriding legitimate ground for the processing; (c) where you have provided your personal information to us with your consent and you wish to withdraw your consent and there is no other ground under which we can process your personal information; and (d) where you believe the personal information we hold about you is being unlawfully processed by us;
- **Right of restriction:** to restrict processing of your personal information where: (a) the accuracy of the personal information is contested; (b) the processing is unlawful but you object to the erasure of the personal information; (c) we no longer require the personal information for the purposes for which it was collected, but it is required for the establishment, exercise or defense of a legal claim or (d) you have objected to us processing your personal information based on our legitimate interests and we are considering your objection;
- **Right to object:** to object to decisions which are based solely on automated processing or profiling;
- **Right to ask for a copy:** where you have provided your personal information to us with your consent, to ask us for a copy of this data in a structured, machine-readable format and to ask us to share (port) this data to another data controller; or to obtain a copy of or access to safeguards under which your personal information is transferred outside of the EEA.
- **Right to withdraw your consent.** You have the right to withdraw your consent on using your personal data. If you withdraw your consent, we may not be able to provide you with access to certain specific functionalities of our services.
- **Request the transfer of your Personal Data.** We will provide to you, or to a third-party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Under certain circumstances, you may have the right to object, on grounds relating to your particular situation, to the processing of your personal data by us and we may be required to no longer process your personal data. Moreover, if your personal data is processed for direct marketing purposes, you have the right to object at any

time to the processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. In this case your personal data will no longer be processed for such purposes by us.

In addition to the above, you have the right to lodge a complaint with a supervisory authority for data protection. Please note that the right of access and the right to erasure do not constitute absolute rights and the interests of other individuals may restrict your right of access or erase in accordance with local laws.

We will ask you for additional data to confirm your identity and for security purposes, before disclosing data requested by you. We reserve the right to charge a fee where permitted by law. We will decline to process requests that jeopardize the privacy of others, are extremely impractical, or would cause us to take any action that is not permissible under applicable laws. Additionally, as permitted by applicable laws, we will retain where necessary certain personal information for a limited period of time for record-keeping, accounting and fraud prevention purposes.

To make requests under this Section, please contact us at info@accyp.com.

10. California Resident Rights

This section of the Policy applies to you, if you are a California resident, as per **California Privacy Rights Act, 2020** (simply called “CPRA”), **California Privacy Rights Act (CPRA)**, **California Consumer Policy Act, 2018** (simply called “CCPA”) and **California Online Privacy Protection Act** (simply called “COPPA”). This privacy notice section for California residents supplements the information contained in our Privacy Policy and it applies solely to all visitors, users, and others who reside in the State of California.

Categories of Personal Information Collected

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device. The following is a list of categories of personal information which we may collect or may have been collected from California residents within the last twelve (12) months.

Please note that the categories and examples provided in the list below are those defined in the CCPA. This does not mean that all examples of that category of personal information were in fact collected by us, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been collected. For example, certain categories of personal information would only be collected if you provided such personal information directly to us.

- **Category A: Identifiers.**

Examples: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, driver's license number, passport number, or other similar identifiers.

Collected: Yes.

- **Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).**

Examples: A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.

Collected: Yes.

- **Category C: Protected classification characteristics under California or federal law.**

Examples: Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

Collected: No.

- **Category D: Commercial information.**

Examples: Records and history of products or services purchased or considered.

Collected: Yes.

- **Category E: Biometric information.**

Examples: Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.

Collected: No.

- **Category F: Internet or other similar network activity.**

Examples: Interaction with our Service or advertisement.

Collected: Yes.

- **Category G: Geolocation data.**

Examples: Approximate physical location.

Collected: No.

- **Category H: Sensory data.**

Examples: Audio, electronic, visual, thermal, olfactory, or similar information.

Collected: No.

- **Category I: Professional or employment-related information.**

Examples: Current or past job history or performance evaluations.

Collected: No.

- **Category J: Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).**

Examples: Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

Collected: No.

- **Category K: Inferences drawn from other personal information.**

Examples: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Collected: No.

We use the personal information that we collect or receive for the business purposes as described above. We may disclose the above listed categories of personal information to third parties for business purposes as described above. As previously mentioned in this Policy, we do not “sell” (as such term is defined in the CCPA) personal information.

You are entitled to the following specific rights under the CCPA and CPRA in relation to personal information related to you:

- You have a right to request that we will disclose certain information to you about our collection and use of personal information related to you over the past 12 months, including: (i) The categories of personal information that we collect about you; (ii) The categories of sources from which the personal information is collected; (iii) The purposes for collecting, using, or selling that personal information. (iv) The categories of personal information that we disclosed for a business purpose or sold, and the categories of third parties to whom we disclosed or sold that particular category of personal information. (v) The specific pieces of personal information that we have collected about you.
- You have a right to request that we delete personal information related to you that we collected from you under certain circumstances and exceptions.
- You also have a right not to be discriminated against for exercising your rights under the CCPA.
- You also have a right to submit your request via an authorized agent. If you use an authorized agent to submit a request to access or delete your personal information on your behalf, the authorized agent must: (1) be a person or business entity registered with the California Secretary of State to conduct business in California; (2) provide proof of such registration; and (3) provide documentation or other proof indicating that they are authorized to act on your behalf. We may also require you to verify your identity directly with us, and directly confirm with us that you provided the authorized agent permission to submit the request.

- You have a right to opt-out of sale or sharing of Personal Information (“PI”) and limit the use or disclosure of your Sensitive Personal Information (“SPI”).
- You have a right to correction, where you can request to have your PI and SPI corrected if you find them to be inaccurate.
- You have a right to opt-out of automated decision making, where you can say no to your PI and SPI being used to make automated inferences, e.g. in profiling for targeted, behavioral advertisement online.
- You have a right to know about automated decision making, where you can request access to and knowledge about how automated decision technologies work and what their probable outcomes are.
- You have a right to limit use of sensitive personal information, where you can make businesses restrict their use of your SPI, particularly around third-party sharing.

To make such requests, please contact us at info@accyp.com

The above rights will only become exercisable by California residents if ACC CY falls within the scope of CCPA and/or CRPA. Further, we will verify your request using the information associated with your account, including email address. Government identification may also be required.

A request for access can be made by you only twice within a 12-months period. Any disclosures that we provide will only cover the 12-months period preceding receipt of your request. We do not charge a fee to process or respond to your verifiable User request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will inform you of the reasons for such a decision and provide you with a cost estimate before processing further your request.

11. Notice for Nevada Residents

Under Nevada law, certain Nevada residents may opt out of the sale of “personally identifiable information” for monetary consideration to a person for that person to license or sell such information to additional persons.

“**Personally identifiable information**” includes first and last name, address, email address, phone number, social security number, or an identifier that allows a specific person to be contacted either physically or online.

Please note, we do not sell your personal information to anyone.

12. Rights of users from other jurisdictions

For the purposes of the applicable law, your Data Controller is:

Company Name: A & C Christofi Ltd

Registered Office: 37 Nicou and Despinas Pattichi Avenue Evi Court 3rd Floor, Offices 302-303 Limassol CY - 3071
Cyprus

Depending upon the laws of your jurisdiction, you may be eligible for some or all of the following rights in respect of your personal information:

- i. **Right to obtain information:** You may have a right to obtain information about how and on what basis your personal information is processed and to obtain a copy.
- ii. **Right to rectification:** You may have the right to have any incomplete or inaccurate information we hold about you rectified and corrected.
- iii. **Right of Erasure:** You may have the right to erase your personal information in limited circumstances where (a) you believe that it is no longer necessary for us to hold your personal information; (b) we are processing your personal information on the basis of legitimate interests and you object to such processing, and we cannot demonstrate an overriding legitimate ground for the processing; (c) where you have provided your personal information to us with your consent and you wish to withdraw your consent and there is no other ground under which we can process your personal information; and (d) where you believe the personal information we hold about you is being unlawfully processed by us.
- iv. **Right of restriction:** You may have the right to restrict processing of your personal information where: (a) the accuracy of the personal information is contested; (b) the processing is unlawful but you object to the erasure of the personal information; (c) we no longer require the personal information for the purposes for which it was collected, but it is required for the establishment, exercise or defense of a legal claim or (d) you have objected to us processing your personal information based on our legitimate interests and we are considering your objection.
- v. **Right to object:** You may have the right to object to decisions which are based solely on automated processing or profiling.
- vi. **Right to ask for a copy:** Where you have provided your personal information to us with your consent, you may have the right to ask us for a copy of this data in a structured, machine-readable format and to ask us to share (port) this data to another data controller; or to obtain a copy of or access to safeguards under which your personal information is transferred outside of your jurisdiction.
- vii. **Right to withdraw your consent.** You may have the right to withdraw your consent on using your personal data. If you withdraw your consent, we may not be able to provide you with access to certain specific functionalities of our services.
- viii. **Request the transfer of your Personal Data.** If you so have this right, we will provide to you, or to a third-party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note that this right may only apply to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

To make such requests, please contact us at info@accyp.com. Please note, we reserve the right to reject the request if you are not entitled to the right that you request to enforce.

13. How do we respond to legal requests?

We may access, preserve, and share your information in response to a legal request (like a search warrant, court order or subpoena) if we have a good faith belief that the law requires us to do so. This may include responding to legal requests from law enforcement agencies, courts, tribunals and government authorities. We may also access, preserve, and share information when we have a good faith belief it is necessary to: detect, prevent, and address fraud and other

illegal activity; to protect ourselves, you and others, including as part of investigations; or to prevent death or imminent bodily harm. We also may retain information from accounts disabled for violations of our terms for at least a year to prevent repeat abuse or other violations of our terms.

14. Children Privacy

Protecting children's privacy is important to us, and therefore our website or our services are not intended for children under the age of 18. We do not direct the App/website or our services to, nor do we knowingly collect any personal information from, such children. If we learn that a child has provided personally identifiable information to us, we will use reasonable efforts to remove such information from our database. **Please contact us at info@accyp.com if you believe we unknowingly collected information described in this Section.**

15. How can I withdraw my consent? (OPT-OUT)

If you change your mind, you may withdraw your consent provided under this Privacy Policy at any time by contacting us at info@accyp.com.

16. Governing law and Dispute Resolution

Unless provided by the relevant statute, rules, or directives applicable to the jurisdiction in which you reside, in case of any disputes, issues, claims or controversies arising out of or in relation to your use of the website. or our services, the governing law and dispute resolution mechanism as provided in the **Terms & Conditions** shall apply to this **Privacy Policy** as well.

17. Do you have questions or concerns about this Privacy Policy?

In the event you have any grievance regarding anything related to this Privacy Policy, Terms & Conditions, or with any content or service of ACC CY, in that case you may freely write your concerns through your registered email to Grievance Officer/Designated Representative at info@accyp.com.

18. Updates to this Policy

We may add to or change or update this **Privacy Policy** at any time, from time to time, entirely at our own discretion, with or without any prior written notice. You are responsible for checking this Policy periodically. Your use of the website after any amendments to this Policy shall constitute your acceptance to such amendments.

19. Welcoming of Suggestions

We welcome your comments regarding this Privacy Policy. Please write to us at info@accyp.com.

Last updated on **March 15, 2024**