

**Privacy policy related to the processing of personal data on [www.eshopwedrop.com.cy](http://www.eshopwedrop.com.cy) website  
(the „Privacy Policy”)**

Within Eshopwedrop (“ESWD”) network, we respect your privacy. This Privacy Policy describes the types of personal information we collect about customers, how we may use the information, with whom we may share it, the measures we take to safeguard personal information, how we handle your rights to your personal data, when you ask us to (i) access or change the personal information we keep about you, (ii) withdraw consent you previously provided to us, (iii) restrict the processing we carry on your data, (iv) refrain from sending you certain communications, (v) ensure the portability of your personal data, or (vi) deletion of your personal data, and (vii) answer questions you may have about our privacy practices.

This Privacy Policy explains how our ESWD platform (operating under a service franchise model), hereinafter referred to as „we”, „ESWD”, „our” or „us”, processes the personal data of the Users („Users”, „you”, „your”) visiting and accessing the website [www.eshopwedrop.com.cy](http://www.eshopwedrop.com.cy) (the „Website”), respectively purchasing and using the Services available through the Website (the „Customers”).

Unless otherwise defined herein, the terms used in capital letters shall have the meaning assigned to them under the *GENERAL TERMS AND CONDITIONS AND SPECIFIC ON-LINE SALE SERVICES TERMS*, available here [www.eshopwedrop.com.cy](http://www.eshopwedrop.com.cy) (the „T&C”).

<p align="center"><b>Controller of your personal data (determines the purposes and means of the processing of personal data)</b></p>	<p><u>EshopWedrop.com Holding Ltd.</u> (a company incorporated in the Republic of Malta, Registration number C 71443, Headquarters: BS Building, Mosta Road, Lija, LJA 9012), the owner of the Eshopwedrop franchise business, as well as of the Eshopwedrop platform, is herein acting as the <i>Controller</i> of your personal data.</p> <p>EshopWedrop.com Holding Ltd. has appointed, as franchisee for <b>Cyprus</b>, the company <b>ESHOPWEDROP (CY) LTD</b>, as the Services Provider (according to the T&amp;C), herein acting as the <i>Processor</i> of your personal data, has been entrusted by EshopWedrop.com Holding Ltd. with operating the Website and providing the Services traded through the Website (the “<b>E-Shop</b>”), using the ESWD platform, under the strict instructions of the Controller.</p> <p>Through the Website / the E-Shop, the Service Provider addresses the Users and is mandated by the Customers to perform the Services in accordance with the T&amp;C.</p> <p>When accessing the ESWD platform and the IT system, and when ensuring their development, functioning and performance, as well as the development of the franchise network under its brand-name and trademarks, the Franchisor accesses and processes your personal data, acting in its turn as controller of your personal data.</p>
<p align="center"><b>Purpose of the Privacy Policy</b></p>	<p>The Controller hereby informs the Users/Customers, as personal data subjects, with regard to the processing by the Controller (including collection, sharing, retention) of the Users’/Customers’ personal data, upon the Users’/Customers’</p>

	using the Website/E-Shop and through the ESWD platform, respectively, when the Customers are acquiring and benefiting of the Services provided by the Service Provider. This Privacy Policy shall accordingly apply to the personal data processing performed by the Service Provider, when the Users/ Customers access and, if the case, use the Website for ordering Services.	
<b>What is personal data</b>	<p>Any data or information that helps us to identify the data subjects (the Users/Customers). Some data allows us to directly identify the data subjects (<i>e.g.</i> your name and surname), while other information are less obvious (<i>e.g.</i> the IP of the device you use for surfing on the Website, the MAC address of your computer or mobile phone), but when associated with other elements, help us identify the data subjects and are therefore treated as personal data.</p> <p>We do not collect and/or process in any way special categories of data (<i>e.g.</i> data about health, unique identification numbers, biometric data, etc.).</p> <p>We deliberately do neither request, collect, nor process personal data of minors. Should we identify that such personal data of minors has been accidentally collected/processed, such data will be immediately deleted.</p>	
<b>Data subjects categories (to whom does the personal data belong to)</b>	<p><u>User</u>, <i>i.e.</i> any natural person of at least 18 years that intentionally reaches and benefits of the Website, irrespective of having the intention to set-up the Account and (or) to place an Order and (or) to benefit from the Website in any other way, as the case may be;</p> <p><u>Customer</u>, <i>i.e.</i> any User (natural person of at least 18 years old / legal entity organized and existing according to the laws of its home country) who (a) registered with the Website; and (b) placed an Order and entered into a Distance Contract according to the T&amp;C.</p> <p><u>Representatives</u> of Users/Customers - legal entities; and</p> <p><u>Persons' authorized</u> to pick-up/receive/hand over Parcels, in the name and on behalf of the Customer.</p>	
<b>How do we process your personal data?</b>	<b>What personal data of the data subject we collect and how do we process it? (information we obtain)</b>	<b>What is the legal ground for our personal data processing?</b>
<b>Personal data provided directly by the data subject / collected automatically</b>		
<b>Setting-up the Customer Account</b>	<ul style="list-style-type: none"> <li>➤ <u>First stage:</u> <ul style="list-style-type: none"> <li>• e-mail</li> </ul> </li> <li>➤ <u>Second stage:</u> <ul style="list-style-type: none"> <li>• name and surname</li> <li>• phone number</li> <li>• email</li> <li>• preferred language</li> <li>• ESWD Customer Code/Client ID (<i>i.e.</i> the unique customer code attributed to the</li> </ul> </li> </ul>	<b>Performance of a contract to which the data subject is party <u>or</u> in order to take steps at the request of the data subject prior to entering into a contract</b>

	<p>User upon setting-up the Account)</p> <p>Setting-up an Account on the Website is a prerequisite for ordering Services through the E-Shop. Such mandatory data is needed for us to undertake mandates for delivering the Services. Data subject's refusal to provide the personal data indicated as mandatory leads to the impossibility to become a User entitled to place orders for Services in the E-Shop.</p> <p><u>Optional data in the Account:</u></p> <ul style="list-style-type: none"> <li>• gender</li> <li>• fields of interests.</li> </ul> <p>The same data is collected when the data subject acts as representative of a legal entity, who intends to place orders in the name of such legal entity he/she is mandated to represent when ordering Services; additionally, the name, surname and position of the contact person acting on behalf of the legal entity for the performance of the contract for Services is also provided by the data subject.</p> <p>The User's email address is processed when they receive confirmation on the set-up of their Account.</p> <p>E-mail of User is also processed when they receive e-mails as a reminder for their further input for completing Account set-up, in order to be able to place orders.</p>	
<p><b>Placing Orders for Services / Return Mandate Services and conclusion of distance contracts for Services / Return Mandate Services</b></p>	<p>Upon arrival of a Parcel at the Origin Warehouse / arrival of a Returned Parcel at the Destination Warehouse, the following data is processed in the ESWD platform:</p> <ul style="list-style-type: none"> <li>• ESWD Customer Code;</li> <li>• name and surname;</li> <li>• email;</li> </ul>	<p><b>Performance of the (distance) contract</b></p>

	<ul style="list-style-type: none"> <li>• telephone number.</li> </ul>	
<p><b>Performance of the distance contract with respect to a Parcel / Returned Parcel (including ensuring exercise of the Customer's right of withdrawal)</b></p>	<p>Upon acceptance of the Parcel / Returned Parcel by the Service Provider at the Origin Warehouse / Destination Warehouse and notification to Customer of Order acceptance, in the ESWD platform the following personal data is processed:</p> <ul style="list-style-type: none"> <li>• ESWD Customer Code;</li> <li>• name and surname;</li> <li>• email;</li> <li>• telephone number.</li> </ul> <p>The same personal data is processed upon performance of the further actions for completing an express mandate given by the Customer under a specific Order:</p> <ul style="list-style-type: none"> <li>• storage of the Parcel / Returned Parcel in the Origin Warehouse / Destination Warehouse;</li> <li>• re-packaging of Parcels / Returned Parcels, according to the T&amp;C;</li> <li>• customs formalities in the name and on behalf of the Customer (if the case, according to the applicable laws) – additional data may be processed: <i>i.e.</i> order, invoice for the Product, personal statement regarding contents of Parcel, signature, correspondence for the execution of the customs special mandate;</li> <li>• road transportation of the Parcel / Returned Parcel;</li> <li>• storage of the Parcel / Returned Parcel in the Destination Warehouse / Origin Warehouse;</li> <li>• informing the Customer (by e-mail and/or in his/her Account) about the Parcel / Returned status: in Origin Warehouse / in Destination Warehouse, in Transit, in Intermediary Warehouse, in Destination Warehouse / in Origin Warehouse, in Consolidation/ to be picked-up by the</li> </ul>	<p><b>Performance of the (distance) contract</b></p>

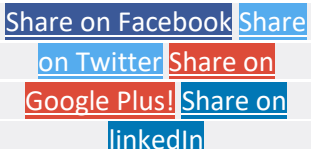
	<p>Customer, Picked-up by the Customer, in Consolidation /to be delivered to Courier, Picked-up by Courier, in Consolidation/to be delivered to Click-and-Collect point/picked up by the Customer/Customer's representative;</p> <ul style="list-style-type: none"> <li>• issuing the invoices for the tariffs for Services / Return Mandate Services and for any other applicable tariff (e.g. customs clearance).</li> </ul> <p>Personal data regarding payment transactions (e.g. details of cards) are not available / kept in the ESWD platform. The Customer's IBAN may be requested in the ESWD platform in exceptional cases (i.e. the Customer exercised their right to withdrawal and they must be reimbursed for the amounts already paid, an Order is cancelled after the due amounts have been paid by the Customer); nevertheless, such data is not kept in the ESWD platform, such details are deleted as soon as the reimbursement is operated.</p>	
Customer care services	<p>For ensuring Customer care services with regard to your Account / Order for Services / Return Mandate Services, the following data is processed, mainly for identification of the Customer:</p> <ul style="list-style-type: none"> <li>• name and surname;</li> <li>• e-mail address;</li> <li>• phone number;</li> <li>• ESWD Customer Code.</li> </ul> <p>We may process, as per your prior specific consent, your voice in the phone discussions we have, in order to grant you support as per your request.</p> <p>We may process the same data for solving the claims you make with respect to our Services / Return Mandate Services.</p>	Performance of the (distance) contract

<p><b>Handing-over the Parcel / Returned Parcel to the Customer/Customer's representative/authorised person</b></p>	<p>Upon handing over of the Parcel / Returned Parcel to the Customer/Customer's authorised representative, the following personal data is processed:</p> <ul style="list-style-type: none"> <li>• name and surname;</li> <li>• telephone number;</li> <li>• ESWD Customer Code;</li> <li>• delivery address (if the case).</li> </ul> <p>Upon handing over of the Parcel / Returned Parcel to the Customer/Customer's authorised representative, the Customer/Customer's representative may be asked to present valid identification documents (they can be asked to show ID exclusively for identity validation, in order to avoid fraud, no copies or pictures of such ID papers are to be kept/stored upon actual receipt of the Parcel / Returned Parcel).</p> <p>Validation of the Customer's/Customer's authorised representative's identity is required also to prevent money laundering and terrorism financing, according to the relevant laws.</p> <p>The same personal data of the Customer/Customer's authorised representative is processed in the paper documentation kept by the last mile delivery service provider, upon the instructions of the Service Provider.</p>	<p><b>Performance of the (distance) contract</b></p> <p><b>Our legitimate interest</b> of preventing potential fraudulent actions</p> <p>The Customer may oppose at any time to the processing of such data, by sending an e-mail to the following address <a href="mailto:info@eshopwedrop.com.cy">info@eshopwedrop.com.cy</a>, on grounds relating to his or her particular situation. The Customer's data will no longer be processed in the ESWD platform, in accordance with the legal provisions.</p>
<p><b>General commercial communications (weekly newsletters)</b></p>	<p>Sending to Users/Customers general e-mail communications (newsletters) regarding Eshopwedrop Services.</p>	<p><b>Your prior consent</b></p> <p>You can withdraw at any time your consent for receiving such materials, by clicking on the unsubscribe link, at the end of every newsletter.</p>
<p><b>Reminders on status of Customer Account</b></p>	<p>Sending to the Customer reminders by e-mail on the status of their Account (e.g. no ordering activity in the last 1 month), regarding similar Eshopwedrop Services available for ordering</p>	<p><b>Our legitimate interest</b></p> <p>The Customer may oppose at any time to receiving such e-mails, by clicking on the</p>

	by the Customer on the Website, in the context where the Customer has already ordered Services and gave its e-mail address to us to this end.	unsubscribe link, at the end of every such email, on grounds relating to his or her particular situation. The Customer's data will no longer be processed in the ESWD platform in accordance with the legal provisions.
<b>Vouchers</b>	The Customer may receive vouchers (discounts / benefits) for their loyalty. Such vouchers shall be visible in the Customer's Account.	<b>Performance of the contract / Our legitimate interest</b>
<b>Unilateral termination of a distance contract</b>	The e-mail address/any other address of a Customer infringing the distance contract ( <i>e.g.</i> the Parcel does not meet the mandatory elements as per the T&C), may be processed for sending them a notification of termination of the distance contract for Customers' fault.	<b>Performance of the (distance) contract</b>
<b>Indemnification of the Customer as per CRM or contractual guarantee service</b>	<p>The following data is processed when indemnifying the Customer based on CRM rules or on contractual guarantee service:</p> <ul style="list-style-type: none"> <li>• name and surname;</li> <li>• telephone number;</li> <li>• ESWD Customer Code;</li> <li>• invoice attesting the Customer having purchased the Product;</li> <li>• bank statement confirming the amount paid by the Customer / online order placed for the Product.</li> </ul> <p>No financial data of the Customer (<i>e.g.</i> IBAN code) is kept in the ESWD platform.</p>	<b>Performance of the (distance) contract</b>
<b>Commercial communication based on customer segmentation (profiling)</b>	Based on the social interests you choose to share with us by personalizing your Account ( <i>e.g.</i> hobbies, age, other personal interests etc.), we may prepare and send to you (including by using third party partners specialized in such processes), on your e-mail, customized offers regarding Services that we may render in connection with products/services you may be interested in, including shopping tips ("Customized Offers"), based on the segments/customers profiles we create and in which we place you to this end.	<p><b>Your prior consent</b></p> <p>For segmentation/profiling in order to send Customized Offers through the communication channels preferred by the Customers (e-mail, SMS).</p> <p>You can withdraw at any time your consent for receiving such materials, including to being subject to</p>

	<p>However, we shall send such Customized Offers only following your specific consent to this end.</p> <p>We may use such segmentation to send to you surveys asking for your feedback regarding various interactions you've with us, aimed at improving our Services.</p> <p>We may generate such segments based also on combining the information you choose to share with us in your Account, with the cookies placed according to our Cookies Policy available on the Website.</p>	<p>segmentation/profiling for marketing purposes, by clicking on the unsubscribe link at the end of every such email.</p> <p>We will stop sending you such materials.</p> <p><b>Our legitimate interest</b> of aiming to constantly improve our services further to your answers to our surveys.</p> <p>You can oppose to receiving communication for taking part to such surveys, by clicking on the unsubscribe link at the end of every such email, on grounds relating to your particular situation. The Customer's data will no longer be processed for this purpose in the ESWD platform, in accordance with the legal provisions.</p>
<b>Audit and reporting</b>	<p>We may process personal data of our Customers for annual financial audit, reporting and other fiscal obligations (if the case).</p> <p>We also process personal data in the ESWD platform for generating reports aimed at improving our franchise business model.</p>	<p><b>Legal obligations</b></p> <p>When required under the law, for meeting specific tax obligations.</p> <p><b>Our legitimate interest of improving</b> the franchise business model under which we operate.</p>
<b>Protecting our rights in the court of law / arbitration court</b>	<p>When we protect our rights in a court of law / arbitration court (e.g. for recovering bad debts), or protect our interests against ungrounded claims, we shall process Users'/Customers' data necessary as per the legal provisions, to prepare and sustain our legal actions.</p>	<p><b>Our legitimate interest</b> of protecting/enforcing our rights and defending us against claims</p>



<b>Procedures and investigations carried out by official authorities</b>	Strictly in accordance with the law, in exceptional situations, we may provide to the competent authorities, during official proceedings/investigations or other procedures under the law, the following personal data: name and surname, address, e-mail, telephone number, Parcel details ( <i>e.g.</i> investigations regarding contents of Parcel), banking details in our possession ( <i>e.g.</i> case of suspicion of fraud).	<b>Our legal obligations</b>
<b>Cookies</b>	Please refer to our Cookies Policies for details regarding the use of Cookies on the Website, along with the mechanisms under which you can take action regarding the Cookies.	<b>Consent for Cookies</b> ( <i>if the case</i> )
<b>Different actions of the User / Customer on the Website</b>		
	<p>Share Social plugins are tools made available by social media platforms that let you share your experiences on our Website with your friends on Facebook / Twitter / Goole Plus / linkedin.</p> <p>Our Website doesn't receive the information that appears in the plugin; we are / are not automatically notified about actions you take within the plugin. Example: if you use the <i>Share on Facebook</i> plugin to share the <i>Contact</i> section of our Website, the Website may be able to connect your share to your profile on Facebook.</p> <p>Unless you are already logged into the relevant social platform account when visiting our Website (<i>e.g.</i> Facebook), you will be asked to log you're your account before you can use the plugin.</p> <p>We do not store your profile as defined on the social media platform, or other information from your profile.</p>	<b>Our legitimate interest</b>

	By making available the <i>Share</i> buttons on our Website, we do not collect personal data.	
<b>Clients (Customers) reviews</b>	<p>You have the possibility to send us feedback on your experience with our Website / Services / Return Mandate Service, by placing reviews on our dedicated section on the Website.</p> <p>We collect in this process your name, in case you choose to indicate your real name and/or your full name; also, we indicate the country from which you rate our service. The personal remarks you make in this section are meant to be published on the Website and are therefore scrutinized in order to abide by rules applicable to such posting.</p> <p>We do not collect / store in this process your profile on such social media platforms, or any other personal data belonging to you.</p> <p>In case the User/Customer sends any other personal data, along with the review, upon their own initiative and will, we will immediately delete such personal data and will not in any way store it with us.</p> <p>The social media platform receives information about your account logging to our page on the social media platform.</p>	<b>Our legitimate interest</b>
<b>Find us on Facebook, Google Plus, Twitter, YouTube, Pinterest, LinkedIn</b>	<p>If you are registered with your account on any social media platform and click the relevant pictogram, you will be directed to our profile on the respective social media platform.</p> <p>We do not collect / store in this process your profile on such social media platforms, or any other personal data belonging to you.</p>	

	The social media platform receives information about your account logging to our page on the social media platform.	
<b>Register for our Newsletter</b>	In case a User gives us their consent for receiving our general commercial communication newsletter, we process only the User's e-mail for sending them the general newsletter.	<b>User's prior consent</b> User can withdraw consent at any time, by accessing the Unsubscribe link shown in every newsletter.
<b>Contact us</b>	Any User can contact us with any query on our Services, by sending a message on the Contact field; we collect their name, email address, the telephone number, their message. We keep this data exclusively for responding to the User and do not use the personal data for any other purpose. Personal data collected via "Contact Us" are deleted within maximum 6 months, unless we keep them for legal grounds.	<b>Our legitimate interest as online business</b>
<b>Website maintenance and security</b>	<p>We use the following online identifiers for ensuring security of the Website:</p> <ul style="list-style-type: none"> <li>• User IP address;</li> <li>• MAC address;</li> <li>• Internet browser and version of operating system of the device used for accessing the Website;</li> <li>• HTTP/HTTPS protocol data;</li> <li>• Location of the device (only if the geo-location function of the device is activated and only as consequence of such function incorporated in the device) used for accessing the Website.</li> </ul> <p>More precisely, we process this data for (i) ensuring a better functioning of the Website, respectively for:</p> <ul style="list-style-type: none"> <li>• accurate publishing of the contents of the Website;</li> <li>• retention of the authentication details (upon the User's request);</li> <li>• improving the Website;</li> </ul>	<b>Our legitimate interest</b>

	<ul style="list-style-type: none"> <li>parametrizing the device to the requirements of the Website; and for</li> </ul> <p>(ii) ensuring the security of the Website and its protection against fraud or other IT security breach with respect to the Website / E-Shop and for (iii) identifying and remedying the deficiencies preventing the use of the Website or of the Account.</p>	
<b>Recipients of the data</b>	<p>When involved in correspondence with our Users/Customers, or when performing our obligations and responsibilities as per the distance contract with customers, the recipients of personal data may be even the <b>data subjects</b> of that data.</p> <p><b>ESWD companies (members of our network)</b> effectively involved in the performance of the Customer's distance contract for Services / Return Mandate Services, including in the business processes and operation of the IT systems supporting the ESWD platform and the operation of the franchise business. We share only the data necessary for carrying out the operations needed to ensure the delivery of the Services / Return Mandate Services, <i>i.e.</i> the Service Provider, franchise owner, Origin Country warehouse entity, logistic companies, land transportation company, destination warehouse company, last mile delivery services providers.</p> <p>We may share such data with <b>third party contractors (non-members of our franchise)</b> for the performance of the contract for Services / Return Mandate Services (<i>e.g.</i> Mail Chimp, Facebook, Google).</p> <p>We use specific and strict rules when selecting our partners/third party contractors, in terms of protection of personal data and compliance with data privacy rules, including GDPR rules.</p> <p>In exceptional cases where <b>relevant authorities</b> (<i>e.g.</i> customs, police) request, in accordance with the legal provisions, to have access to data for carrying out public tasks in accordance with their powers, we may share data in official investigations on fraud or other suspicious conducts. We may also present personal data in the <b>court of law</b>, when defending our cause.</p> <p>If we undergo a reorganization or a purchase/sale procedure, we may share your data with third parties participant to such procedures (including to auditors, consultants), during audits performed on our activity / business / companies. We will ensure such third parties undertake obligations for keeping secure and for implementing necessary measures to ensure security of data.</p>	

<p><b>Retention of data</b></p>	<p>Users’/Customers’ personal data (including history of orders) shall be kept in the IT system for 3 (three) years since the last Order for Services/Return Mandate Services placed on the Website (but in any case no longer than necessary). After that term, personal data mandatory to be kept for longer periods (e.g. financial documents, invoices) shall be kept securely in accordance with the relevant legal provisions.</p> <p>Accounts that are not used for a 12-month period, are to be de-activated and corresponding personal data is to be deleted / anonymized (so as the data subject can no longer be identified), unless we are obliged by law or our legitimate interest to do otherwise. We shall notify the User/Customer in advance on the de-activation of the Account.</p> <p>Accounts where registration was not completed (only first step was completed) are to be deleted after 6 (six) months, if the User has not completed the second step of the registration, even after receiving 3, (three) iterations of completing the Account.</p> <p>As regards the data used upon the prior consent of the data subject, we will process this data for that purpose only until the User/Customer withdraws their consent, unless we are obliged to keep such data for a longer period, according to the law, for enquiries made by relevant authorities or in order to defend our rights.</p> <p><i>*Consent</i> – means the free, specific, informed agreement of the User/Customer, where they undoubtedly accept for their data to be processed by us for the specific purpose they are consenting to.</p>
<p><b>Security</b></p>	<p>We ensure the technical and organizational measures necessary to collect, process and keep the personal data securely, including against un-authorised access and use of data. Such measures are at least:</p> <ul style="list-style-type: none"> <li>- administrative and organizational measures to ensure confidentiality by the persons effectively accessing the data;</li> <li>- flows and operational procedures for ensuring data subjects’ exercise of rights;</li> <li>- security of data hosting environments;</li> <li>- ensuring by reasonable measures that our partners/subcontractors define and implement adequate security with regard to personal data we share.</li> </ul>
<p><b>Transfer of data to third countries</b></p>	<p>Currently, our data are kept within locations in EU countries. In case the transfer of Users/Customers data to ESWD units / subcontractors / partners in non-EES countries is necessary (<i>the EES countries being the UE countries, plus Switzerland, Iceland, Liechtenstein and Norway – considered to have equivalent laws with</i></p>

	<p><i>respect to privacy law</i>), in cases where the place for storing our data or the location of our ESWD units / subcontractors / partners is outside SEE. Should the data reach such non-SEE countries, we shall always ensure that a proper legal contract covering such transfer is in place, in accordance with the standards adopted by the European Commission to this end. Nevertheless, should such a third party does not have laws equivalent to the UE data protection standards, we shall ask such third party recipient to enter into a binding agreement reflecting these standards.</p>
<p><b>Data subject's rights</b></p>	<p>In order to make sure that each User/Customer is in control of their personal data, we ensure that each data subject enjoys the following possibilities, based on available technologies:</p> <ul style="list-style-type: none"> <li>▪ They may operate their Account and amend / delete / edit data;</li> <li>▪ They may delete cookies from their browser;</li> <li>▪ The social media platforms offer mechanisms where the User/Customer may choose their options regarding sharing data with other sites.</li> </ul> <p>Also, in your capacity as data subject, according to Regulation EU 2016/679, the Users/Customers enjoy the rights detailed below (Users/Customers may be asked to prove their identity and quality as Account holder, in order for their requests be analysed). We shall try to answer to requests without delay and no later than 30 days (or in another reasonable term, as per the Regulation).</p> <p><b>Right to be informed.</b> The User has the right to receive clear, transparent, easy to understand and access, information, with respect to the manner in which we process their personal data, including details about their rights as data subject. This information is presented in this Privacy Policy.</p> <p><b>Right to access their personal data.</b> The User/Customer is entitled to access their data we process about them; we will not charge for initial requests. If the User/Customer requests copies of the data already provided, we may charge a reasonable fee, considering the administrative costs associated with the provision of such data. We reserve the right to refuse excessive and/or repeated requests. The request for access right must be sent by the User/Customer at:</p> <ul style="list-style-type: none"> <li>- E-mail: <a href="mailto:info@eshopwedrop.com.cy">info@eshopwedrop.com.cy</a></li> </ul> <p><b>Right to rectification.</b> The User/Customer that identifies the fact that the data we process about them is incorrect, incomplete or inaccurate, may:</p> <ul style="list-style-type: none"> <li>- Send us a request for rectification at e-mail <a href="mailto:info@eshopwedrop.com.cy">info@eshopwedrop.com.cy</a></li> </ul> <p><b>Right to object to direct marketing.</b> The User/Customer may object at any time and un-scribe from our direct marketing materials. They may do this only by clicking the un-scribe me link provided in each such communication we sent to them.</p> <p>Withdrawal of consent (un-scribing or written request) does not affect legality of the processing based on consent, before the withdrawal taking place.</p>

**Right to object based on legitimate interest.** The User/Customer may oppose at any time to any processing based on our legitimate interest. Under the section „Legal grounds” of the table, you may identify easily the cases in which we process personal data based on our legitimate interest. The User/Customer may exercise their right to object by sending a written request to [info@eshopwedrop.com.cy](mailto:info@eshopwedrop.com.cy).

**Right to erasure (right to be forgotten).** The User/Customer is entitled to request the deletion of their rights in any of the following situations: (a) personal data is no longer necessary for accomplishing the purposes for which it has been processed, (b) User/Customer withdraws consent where processing has been based on consent, and we do not have other legal ground for continuing the processing, (c) the User/Customer objects to processing for direct marketing (including to profiling for direct marketing, if the case), (d) the User/Customer objects to processing based on our legitimate interest and we cannot show a reason for which our legitimate interest prevails over their interests, rights and freedoms, (f) personal data is processed contrary to the law; (g) personal data must be deleted in order to comply with legal provisions.

Right to erasure is not an absolute right. We may deny the request if (i) we are obliged by a legal provision to keep the data; or (ii) the data is necessary for attesting, exercising or protecting our rights in a court of law.

The User/Customer may request deletion of data by sending their request by e-mail at [info@eshopwedrop.com.cy](mailto:info@eshopwedrop.com.cy).

**Right to ask for restriction of the processing.** The User has the right to obtain from us the restriction of processing in any of the situations below:

- (a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- (b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- (c) we no longer need the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise or defence of legal claims;
- (d) the data subject has objected to processing based on our legitimate interest, pending the verification whether the legitimate grounds of the controller override those of the data subject (User/Customer).

The User/Customer may exercise their right by sending their request by e-mail at [info@eshopwedrop.com.cy](mailto:info@eshopwedrop.com.cy).

**Right to data portability.** When we process a User's/Customer's personal data based on their consent or contract performance, by automatic means, the respective User/Customer is entitled to request to transfer their personal data: (a) to the User/Customer or (ii) to another controller indicated by the respective

	<p>User. The User may request the transfer only of the personal data the User/Customer themselves provided to us directly and actively (except for any data that we inferred or created/determined).</p> <p>The User/Customer may exercise their right by sending their request by e-mail at <a href="mailto:info@eshopwedrop.com.cy">info@eshopwedrop.com.cy</a>.</p>
<b>FAQ</b>	<p>We may answer to any request for information with regard to this Privacy Policy. You may contact us as follows:</p> <ul style="list-style-type: none"> <li>- by e-mail, at: <a href="mailto:info@eshopwedrop.com.cy">info@eshopwedrop.com.cy</a></li> <li>- by phone, at: +35722711212</li> </ul> <p>Access, erasure, rectification or portability shall not address data of other parties.</p>
<b>Complaint to National Data Protection Authority</b>	<p>In case you consider yourself harmed by the processing of your data as per the terms herein, you may address to your National Data Protection Authority. <a href="http://www.dataprotection.gov.cy">www.dataprotection.gov.cy</a> .</p> <p>THE SITE OF EVERY DATA PROTECTION AUTHORITY SHOULD BE INDICATED</p> <p>We trust that you will choose to contact us first, in order to try and settle any aspect, at email: <a href="mailto:info@eshopwedrop.com.cy">info@eshopwedrop.com.cy</a>.</p>
<b>Updates to our Privacy Policy</b>	<p>This Privacy Policy is available on the Website. You may also request a copy by e-mail at: <a href="mailto:info@eshopwedrop.com.cy">info@eshopwedrop.com.cy</a> . The Cookies Policy shall also apply.</p>
<b>Version</b>	<p>Version available starting with 25<sup>th</sup> of May 2018.</p>