

Promotional activities
Privacy Policy

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1. Introduction

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information in connection with promotional prize draws, competitions and other promotions for our products in the Republic of Cyprus. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the General Data Protection Regulation (EU) 2016/679 (commonly known as the “GDPR”), which applies across the European Union and we are responsible as the controller of that personal information for the purposes of those laws.

This privacy policy concerns promotional prize draws, competitions and other promotions organised by us or our representatives on our behalf in the Republic of Cyprus.

2. Key terms

It would be helpful to start by explaining some key terms used in this policy:

we, us, our	Mars Egypt for Trade LLC, a limited liability company registered in Egypt with registered office Land Plot 62-70, Industrial Zone 3, 6th October City, Egypt.
our representative	The Worx Brand Involving Communications Ltd, a limited liability company registered in the Republic of Cyprus with registration number HE165657, which is organising and administering on our behalf promotional prize draws, competitions and other promotions in the Republic of Cyprus.
personal information	Any information relating to an identified or identifiable individual.
promotional activity	a promotional prize draw, competition or other promotional activity for our products in the Republic of Cyprus organised by us or on our behalf.
special categories of personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, Genetic and biometric data. Data concerning health, sex life or sexual orientation.

3. Who are we

We are Mars Egypt for Trade LLC, a limited liability company registered in Egypt with registered office Land Plot 62-70, Industrial Zone 3, 6th October City, Egypt.

While we do not have direct presence in the Republic of Cyprus, we have appointed The Worx Brand Involving Communications Ltd, a Cyprus advertising agency, as our representative to organise and administer on our behalf promotional prize draws, competitions and other promotional activities for our products in the Republic of Cyprus. For those purposes, our representative will be acting on our behalf as a data processor.

4. Personal information we collect about you

We may collect and use the following personal information about you:

- **Identity Data** which includes your first name and last name, and information that enables us to check and verify your identity, such as your identity card number.
- **Contact Data** which includes physical address, email address and telephone number.
- **Competitions Data** which includes information relating to your participation in a promotional activity.

This personal information is required for you to participate in our promotional prize draws, competitions or other promotions and for us to arrange and provide you with

prizes in case you win (see below ‘**How and why we use your personal information**’).

Where we need to collect personal information by law, or in order to be able to administer the promotional activity in which you are participating or seek to participate in and you fail to provide that information when requested, this may prevent you from participating in the relevant promotional activity or receiving your prize.

We do not usually collect and use personal information of children (i.e. individuals who are under the age of sixteen) and we do not allow children to participate in our promotional activities. Where we need to collect and use such personal information, we do so only provided that we have first obtained their parents’ or legal guardian’s consent or we are otherwise permitted or required under the law.

5. How your personal information is collected

We collect most of this personal information directly from you - by telephone, text or email and via any of other method of communication you may use, including Facebook Messenger.

We may also collect information about you from your social media profiles, including your profile on the social networking website Facebook.com (‘Facebook’), provided that this information was made publicly available by you.

6. How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party, where your interests and fundamental rights do not override our interests or those of a third party; or
- where you have given your consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and the legal bases which we rely on to do so:

What we use your personal information for	Type of information	Lawful basis for processing
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<p>To enable you to participate in and us or our representative to organise and administer our promotional activities, including</p> <p>(a) to register your participation in the promotional activities in which you choose to participate;</p> <p>(b) to process your entry in our promotions, draws and competitions;</p> <p>(c) to notify you of the results of the promotional activity;</p> <p>(d) arrange and deliver a prize to you in case you win;</p>	<p>(a) Identity Data (b) Contact Data (c) Competitions Data</p>	<p>(a) Performance of a contract with you or to taking steps at your request before entering into a contract</p> <p>(b) Necessary for our legitimate interests (to organise and administer efficiently our promotional activities, which help to develop our business)</p> <p>(c) Your consent (when none of the above applies)</p>
<p>Assessing and responding to claims or audits, enquiries or investigations by regulatory bodies or authorities</p>	<p>(a) Identity Data (b) Contact Data (c) Competitions Data</p>	<p>(a) Necessary to comply with our legal and regulatory obligations</p> <p>(b) Necessary for our legitimate interests (for protecting our rights and defending ourselves in the context of claims or audits, enquiries or investigations)</p>
<p>External audits and quality checks</p>	<p>(a) Identity Data (b) Contact Data (c) Competitions Data</p>	<p>(a) Necessary to comply with our legal and regulatory obligations</p> <p>(b) Necessary for our legitimate interests (for ensuring that our promotional activities are carried out fairly and in accordance with their terms)</p>

The above table does not apply to special categories of personal information, which we will usually only process with your explicit consent (unless the law allows to do so without it).

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7. Who we share your personal information with

We will mainly share personal information with our representative.

It is also possible that we may share personal information with:

- companies within our group;
- such as third parties we use to help deliver our products and services to you, logistics and;
- service providers and other third parties we use to help us run our business and organise and administer our promotional activities, e.g. marketing agencies, payment service providers, logistics providers and website hosts;
- third parties approved by you, e.g. social media sites you choose to link your account to;
- professional advisers including lawyers, consultants and auditors who provide legal, consultancy and auditing services to us; and
- our insurers and banks.

We only allow third parties to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies, authorities and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a restructuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

8. Where your personal information is held

Information will be collected and held by our representative at its offices in Cyprus and may also be held at those of our service providers as described above (see above: '**Who we share your personal information with**').

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: '**Transferring your personal information out of the EEA**'.

9. How long your personal information will be kept

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We will usually keep your personal information during the duration of the promotional activity in which you participate and until you collect your prize in case you win. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you in accordance with the law; and
- to keep records required by law.

Different retention periods apply for different types of personal information. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. When it is no longer necessary to retain your personal information, we will delete or anonymise it.

10. Transferring your personal information out of the EEA

We will most likely not transfer your personal information outside the European Economic Area (**EEA**). However, it could in the future be necessary for use to share your personal information with any service providers located outside the EEA or if there is an international dimension to the promotional activity.

If so, such transfers will be subject to special rules under European and Cyprus data protection law.

If we do transfer your personal information out of the EEA, we will ensure a degree of protection similar to that afforded in EEA countries is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the European Commission.
- Where we transfer your personal information to countries that have not been deemed to provide an adequate level of protection for personal information by the European Commission, we may use specific contracts approved by the European Commission which give personal information the same protection it has in Europe.

- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal information shared between the Europe and the US.

If you would like further information please contact us (see ‘How to contact us’ below).

11. Your rights

You have the following rights in relation to your personal information:

Access	The right to be provided with a copy of your personal information.
Rectification	The right to require us to correct any mistakes in your personal information. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.
To be forgotten	The right to require us to delete your personal information (in certain circumstances). This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
Restriction of processing	The right to require us to restrict processing of your personal information (in certain circumstances). This enables you to ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the information's accuracy; (b) where our use of the information is unlawful but you do not want us to erase it; (c) where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party. 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.

To object	The right to object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.
Withdraw consent	The right to withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

For further information on each of those rights, including the circumstances in which they apply, please contact us or visit the website of the Commissioner for the Protection of Personal Data (www.dataprotection.gov.cy).

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: ‘**How to contact us**’;
- let us have enough information to identify you;
- let us have proof of your identity; and
- let us know what right you want to exercise and the information to which your request relates.

You will not have to pay a fee to access your personal information or to exercise any of the other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

12. Keeping your personal information secure

We and our representative have appropriate security measures to prevent personal information from being accidentally lost or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

13. How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The GDPR also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in Cyprus is the Commissioner for Personal Data Protection who can be contacted at 1 Iasonos street, 2nd floor, 1082 Nicosia; tel: 22818456; fax: 22304565; email: commissioner@dataprotection.gov.cy; www.dataprotection.gov.cy.

14. Changes to this privacy policy

This privacy policy was published on 5 May 2020.

We may change this privacy policy from time to time. When we do we will post the updated privacy policy on our website and we will also inform you via email if you are on our mailing list.

15. How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Address: 62 PERICLEOUS STREET, 2021 STROVOLOS, NICOSIA, CYPRUS

Email: info@theworx.com.cy