

PRIVACY POLICY

This website is operated by CHALLENG CONSTRUCTION LTD (“we” or “us”).

We respect your privacy and recognise that when you choose to provide us with information about yourself, you trust us to act in a responsible manner with that information. This privacy policy contains important information about how we use your personal information.

1. What does this data protection policy cover?

This data protection policy (hereinafter referred to as the Policy) stipulates the purposes of processing the personal data collected by Challeng Construction Ltd and address how the personal data is processed by us, their origin, storage terms, purposes of providing the data subjects' rights, data recipients. This Policy applies to any personal information you provide to us and to any personal information that we receive from third parties and other sources. This Policy is not a contract and does not create any rights or obligations for either party other than as provided for in personal data protection laws.

2. Who is responsible for your information?

Challeng Construction Ltd, a private limited company, registered in Cyprus with company registration number HE 398907 and registered office Agiou Efthimiou 10, 2037 Nicosia, Cyprus, is responsible for the personal information we collect about you (and are the data controller in relation to data protection law) that we collect from you or about you.

3. What information do we collect?

At times we may request that you voluntarily supply us with personal information. Generally, this information is requested when you want us to provide you with information.

We will use your personal information in the following ways. We are also required by law to state a “legal basis for processing”, i.e. to tell you on what grounds we are allowed to use your information, and this is also set out below:

What information do we collect and how do we use it?	Our legal basis for processing
<p>Personal data when concluding or administering service contracts</p> <p>In order to conclude and administer service contracts, Challeng Construction Ltd process the following personal data: personal contact details (name, surname, personal identification number, registration or residence address, e-mail address and telephone number, individual activity or business certificate). number, bank account number) and other personal data (such as correspondence with you or your employees) that will be collected by us from the clients or other sources during the service period.</p> <p>The personal data, for the purpose of ordering and administering remunerated services, shall be stored for 10 (ten) years and until the end of the next January 31, after the end of the full implementation of the contract, unless a longer term for</p>	<p>Consent – we only use your personal information for this purpose if you have consented for us to do so. You can withdraw your consent at any time.</p>

such personal data is established by law and / or other legal acts. .

Personal data when promoting the services of Challeng Construction Ltd

We process the following personal information when promoting the services of Challeng Construction Ltd: personal contact details (name, surname, personal identification number, registration or residence address, e-mail address and telephone number, individual activity or business certificate). number, bank account number) and other personal data (such as photos, videos of the project, correspondence with the employees) that will be collected by us from the clients or other information shared by the client that may contain personal information.

Consent – we only use your personal information for this purpose if you have consented for us to do so. You can withdraw your consent at any time.

The above-mentioned personal data may be used by us for advertising the services of Challeng Construction Ltd, including, but not limited to, presenting the results of implemented projects on our website and/or our social media channels, as well as during events (conferences, seminars) or presenting implemented projects to existing Clients, potential Clients, investors or various stakeholders. We process the above personal data, which is used for the purpose of advertising the services, with the consent of the Client or through the service contract.

This personal data and other related information is retained for as long as it may be relevant for the promotion of Challeng Construction Ltd services.

Personal details of job candidates applying for a job offer

For the purpose of keeping a database of job candidates, we process the following personal data: CV, name, surname, date of birth, address of residence, e-mail. postal address, telephone number, links to personal social networking accounts, work experience, skills and other information provided in the CV, recommendation and / or cover letter. In addition to the information provided in the CV, we may also handle answers to questions or tasks.

Consent and our legitimate interests – we use your personal information to assess your job application, and to keep you updated throughout the application process.

We undertake to delete and / or destroy the personal data of the candidates for the job within 3 (three) months and the period before the last day of the month, after the conclusion of the employment contract or within 5 (five) working days, if you have not expressed separate consent for the person processing of data at the end of the selection of candidates.

Employee personal data for the purpose of concluding, administering and enforcing employment contract.

For the administrative purpose of keeping employee database, we process the following personal data: name, surname, personal identification number, date of birth, copy of identity

Consent and our legitimate interests – we use your personal information to assess

card or passport, social security number, personal bank account number, residential address, e-mail address, postal address, telephone number, documents certifying education, photo, personal health information / sick leave requests.

your enforcing your employment, and to keep you updated throughout the employment.

The above personal data shall be stored for 10 (ten) years and for the period until 31 January following the end of the employment contract, unless a longer term for the storage of such personal data is established by law and / or other legal acts.

Other personal data that is not specified in the employment contract and is not related to the work activity or work results are deleted and / or destroyed within 3 (three) months and the period until the last day of the month after the termination of the employment contract.

Contact personal information for marketing purposes

In order to inform you about news and other information about the services, offers, events, etc. provided by Challeng Construction Ltd, for direct marketing purposes, we collect and process your personal data: name, surname, position, e-mail address.

Consent – we only use your personal information for this purpose if you have consented for us to do so. You can withdraw your consent at any time.

We process your contact information based on a legitimate interest and / or your consent. We process this data if you have expressly consented to receiving direct marketing communications by entering into a service agreement with Challeng Construction Ltd or voluntarily submitting your details to us.

Each time you are sent a direct marketing message, you will be given the opportunity to opt out of the direct marketing message by notifying the email address provided by post or by any other means specified in this Policy.

With your consent, we will retain your personal information for 5 (five) years after receiving your consent and for the period up to 31 January next. In the event that we process your personal data for direct marketing purposes on the basis of a legitimate interest, your personal data will be stored for the duration of the remunerated service agreement.

Personal data provided in a complaint or inquiry

We process personal data that is submitted with individuals' complaints or inquiries. This personal data is processed for the purpose of administering complaints or inquiries.

Consent – we only use your personal information for this purpose if you have consented for us to do so. You can withdraw your consent at any time.

We process cookies to improve the operation of the website

We manage the IP addresses and traffic data of visitors to the website www.challeng.com.cy This data is processed with your consent.

Consent – we only use your personal information for this purpose if you have consented for us to do so. You can withdraw your consent at any time.

4. Use of cookies

We use cookies on the website www.challeng.com.cy - text files containing small amounts of information which we download onto your computer or device when you visit our website. Therefore, when we refer to “you” in this section we mean your computer or device. We can recognise these cookies on subsequent visits and they allow us to remember you.

We use the information obtained from cookies for the following general purposes: to ensure the quality of browsing the website, to improve the browsing experience on the website, to analyze the behavior and traffic of website users.

The following types of cookies may be used on our website:

- *Technical cookies*: these are the cookies that are necessary for the operation of our website, for the advanced and easy use of the website, which automatically adapts to the wishes and needs.
- *Functional cookies*: these are cookies that, although not necessary for the operation of the website, significantly improve its performance, quality and user experience.
- *Analytical Cookies*: These are cookies used to understand how visitors use our website, to discover the weaknesses and strengths of the website, to optimize and improve the website's performance, and to continue to implement innovative solutions. The data collected by these cookies is used anonymously.
- *Commercial Cookies*: These cookies are used by us to place company advertisements on other websites. When you visit our website, a message informing you about the use of cookies is automatically activated. You can agree to the use of cookies and continue browsing. If you do not agree with the use of cookies, you have the right to close our website. You can revoke your permission to use cookies at any time. You can do this by changing the settings of your internet browser so that it does not accept cookies, but in this case certain functions of our website may not work or may not work properly. Cookies are stored for a maximum of 6 (six) months. since your last visit. No personal data about you is collected with the help of cookies. No information is provided to any third party during the recording of the required Cookies, except for our partners who serve the information technology economy.

5. Do we disclose your personal information?

We may disclose your personal information if:

1. Required by laws, regulations, orders, standards or other legal requirements;
2. In response to official requests or requests from public authorities;
3. When we believe that disclosure is necessary to prevent financial or other harm;
4. Investigating illegal actions;
5. Transferring all or part of our business;
6. When conducting an audit of the company or investigating complaints and security risks.
7. What security measures do we use to process your personal information?

The security of your personal information is very important to us, and we have implemented technical and organizational measures to protect your personal information from loss, misuse, alteration and destruction. Only properly authorized individuals have access to your personal information, and those individuals are properly informed about how to ensure the security of your personal information. Our service providers and business partners have an obligation to maintain the confidentiality of personal information and not to use it in any way other than intended.

6. What can you do with your personal information?

You have the opportunity to exercise the data subject's rights listed below. In certain cases, the exercise of these rights may be restricted or we may refuse to grant your request, such as when your request is in conflict with the law.

As a data subject, you have the right to contact us with questions related to the processing of your personal data, e.g. you have the following rights:

1. The right to be informed about the processing of data;
2. The right of access to data;
3. The right to request rectification of data;
4. The right to have data erased ("right to be forgotten");
5. The right to restrict the processing of data;
6. The right to data portability;
7. The right to object to the processing of data.

You may exercise these rights by contacting us at the contacts listed in this Policy. We will always try to respond to requests and inquiries as soon as possible or inform you of the need for additional information.

7. Contact us

If you have any wishes, complaints or other questions, please contact us by e-mail.

8. Amendments

This Policy is subject to change from time to time. After the changes, the latest version of the Policy will be posted on our website www.challeng.com.cy and the date of the last change will be updated. We recommend that you read this Policy regularly to keep up to date with the latest practices for handling personal information.

The policy was last updated on 03/01/2022.