

General Privacy Notice (“Notice”)

Introduction

GP GENERAL PROCUREMENT COMPANY LIMITED (GENPRO) recognise and respect the rights and privacy of our applicants, current and former employees, suppliers, and customers.

This Notice explains what we do with your personal data, whether you are applying for employment with us, visiting our premises, continuing your relationship with us, we are providing you with a service or we are receiving a service from you.

It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

This Notice applies to the personal data of our Data Subjects, for example, our Employees, Customers, Visitors, Suppliers of goods and services, and other people whom we may contact in order to find out more about our Employees or whom they indicate as an Emergency contact.

Legal framework

This Notice is written to comply with the applicable data protection legislation which includes, but is not limited to, the European Union General Data Protection Regulation (GDPR).

The company responsible for your personal Data (Data Controller)

Name: GP General Procurement Company Limited

Phone: +357 25843100

Address: 21 Spyrou Kyprianou Ave., Yermasoyia 4042 Limassol, Cyprus

How do we use data?

GENPRO may process personal data as part of its services, employment, risk management, document processing, marketing, procurement.

What personal data do we collect?

Prospective and current Employees:

In order to consider you for employment, or employ you, we need to process certain information about you. We only ask for details that will help us provide what is required as part of your application process or employment. For example, we need information such as your name, age, contact details, education details, employment history, emergency contacts, next of kin, immigration status, passport size photos, passport copies, bank account details, utility bills and of course other relevant information required for the purposes of your employment or that you may choose to share with us. Where appropriate and in accordance with local laws and requirements, we may also collect information related to your health, diversity information or details of any criminal convictions.

To enable employees to conduct GENPRO’s business, all employees will have access to one another’s business contact information including name, position, office telephone number, work address, work e-mail address, and photograph (if you choose to provide one).

Customers

To enable us to communicate with you and to ensure that we fulfill certain legal requirements such as KYC and AML, we need to have certain details or the details of individual contacts at your organisation (such as their names, telephone numbers and email addresses). We ensure that our marketing communications to you are relevant and timely.

Suppliers of goods and services

We obtain a small amount of information from our Suppliers to ensure that things run smoothly. We need contact details of relevant individuals at your organisation so that we can communicate with you.

Emergency contacts

As part of due diligence and to protect the vital interests of our Data Subjects we, under certain circumstances, collect emergency contact details.

Visitors

When visiting our premises, we collect the necessary personal data required for security and notification purposes.

The legal bases we use for lawful processing

In order for GENPRO to conduct business and fulfill its legal, regulatory and contractual obligations, it needs to perform legitimate and fundamental processing. These are:

1. Establishing contracts
2. Maintaining contracts
3. Provision of all contracted services
4. Invoicing, remittance, payments, collections
5. Non-promotional communications
6. Marketing and other promotional communications
7. Risk management contract review
8. Response to Subject Requests
9. Performance measurement
10. IT and telecommunication support services
11. Business Continuity and Contingency Planning
12. Legal and regulatory obligations
13. Responding to enquiries, requests and complaints
14. Employment processing
15. Workforce planning
16. Training and certifications
17. Emergency communications
18. To interact with other organizations, industry groups, professional associations
19. Internal ethics reporting, security and investigations

The categories of people who will access or receive the data

GENPRO needs to share the personal information it processes with individuals themselves and also with other organisations. Below is a description of the types of organisations with which GENPRO may need to share some of the personal information it processes.

1. Agents and brokers
2. Business associates, other professional bodies, advisers
3. Central / local government
4. Claimants, beneficiaries, assignees and payees
5. Claims investigators
6. Complainants, enquirers
7. Courts and tribunals
8. Credit reference, debt collection and tracing agencies
9. Current, past and prospective employers

10. Customers
11. Debt collection and tracing agencies
12. Education and examining bodies
13. Employment and recruitment agencies
14. Family, associates and representatives of the person whose personal data we are processing
15. Financial organisations and advisers
16. Healthcare professionals, social and welfare organisations
17. Law enforcement and prosecuting authorities
18. Ombudsman and regulatory authorities
19. Other companies in the same group
20. Pension schemes
21. Police forces
22. Private investigators
23. Professional advisers
24. Share Administrators
25. Suppliers and services providers
26. Survey and research organisations
27. Unions, trade associations, professional bodies, employer associations

The countries where data will be stored, processed and transferred

Your personal data collected by GENPRO may be stored and processed in the EU or any other country in which GENPRO or associated third parties maintain facilities. Should GENPRO need to transfer your personal data, we will take all reasonable measures to safeguard the transfer of your personal data to third parties in a manner that complies with the applicable data protection laws.

How long the data will be retained?

Retention of specific records may be necessary for one or more of the following reasons:

1. Fulfilling statutory or other regulatory requirements
2. Evidencing events/agreements in case of disputes
3. Operational needs
4. Historical and statistical purposes

Where we collect personal data for which we subsequently have no use for any business purpose, we then review and may destroy such personal data at our discretion.

The right to withdraw consent

In situations where GENPRO requests and receives your consent to perform processing, we are also obliged to stop such processing if you decide to withdraw your consent. Withdrawing consent is as straightforward as giving consent. Withdrawing consent cannot be back-dated so it has no effect on processing already performed during the period of consent.

The right to access, change, delete, restrict, object, request a copy

Under certain circumstances you have rights regarding the personal data we store on your behalf. These are:

1. access to a copy of your personal data
2. object to processing that you object to
3. stop receiving direct marketing material
4. object to decisions being taken by automated means
5. have inaccurate personal data rectified, blocked, erased or destroyed
6. lodge a complaint with the relevant data protection authority
7. claim compensation for damages caused by a breach of the GDPR

What happens if the data is not collected?

Your personal data is required for communication and setting up a contractual agreement to provide employment, products, and services. Without this data GENPRO will not be able to communicate with you or enter into a contractual agreement with you. This includes both business and employment contracts.

GENPRO needs personal data to:

1. enable consensual bilateral communications
2. engage in pre-contractual activities
3. honour contractual obligations
4. enable it to employ people

Without this data, GENPRO will not be able to perform these primary activities.

Automated decision making

GENPRO does not use automated decision making.

Changes to our Notice

Any changes we make to our Notice in the future will be accordingly communicated to all parties involved.

Where GENPRO intends to further process your personal data for a purpose other than that for which the personal data were collected, GENPRO shall provide you, prior to that further processing, with information on that other purpose and with any relevant further information.