

INTRODUCTION

PRIVACY POLICY

Thank you for visiting our Privacy Policy. At **COMAYA LIMITED** (the “**Company**“, “**we**“, “**us**” and “**our**“), we respect your privacy. Our highest priority is to provide a safe environment for your personal data. This Privacy notice is governed by the provisions of EU Regulation 2016/679, which is also known as the General Data Protection Regulations (GDPR).

This privacy notice aims to provide you with all mandatory information regarding the transparency of personal data processing.

This policy explains our privacy practices for this website (the “**Website**”). It describes the ways your personal information is collected and used.

This policy does not govern the privacy practices related to our products and services other than the Website itself.

NAME AND ADDRESS OF THE CONTROLLER

The Controller for the purposes of the General Data Protection Regulation (GDPR), or any other law related to Data Protection is Comaya Limited.

1. DEFINITIONS

Here is a short dictionary of the most commonly used terms you will come across in this Privacy Notice:

Personal Data: any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Data subject: any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

Processing: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Controller: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Consent: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Profiling: any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

2. DATA WE COLLECT FROM YOU

While completing our online contact form, we will require you to provide us with personal information, such as your name and contact details, such as e-mail and phone. We make sure that we do not collect your personal information, unless you provide it to us on your own initiative. You must provide complete, accurate and correct details and you hereby confirm the details you provided are correct. You are not required by law to provide the Company with your personal details. However, if you provide false, incorrect, or out dated information, or only partial information, it may impair our ability to contact you.

When you provide the Company with personal details of another person, you represent and warrant that you received the other person's explicit written consent to provide these details to the Company and use them according to this Policy.

The Company may collect information pertaining to your activity on the Website, including information or content that you have read, your session durations, the web pages you watched, services that were of interest to you, the location of the computer and the Internet Protocol (IP) address through which you had access to the Website and more. Additionally, the Company may collect or use the assistance of third parties to collect and analyze anonymous, statistic or aggregative information related to your use of the Website.

3. USE OF COLLECTED INFORMATION

Our processing of your personal data will be justified if one of the following conditions is satisfied:

- Whenever we obtain your consent;
- Whenever the processing of your personal data is necessary for the performance of a contract;
- Where the processing is necessary for us to comply with a legal obligation;
- Where the processing is necessary for the purposes of our legitimate interests.

We will store the information you provide and the information we collect about your activity on the Website in our database (the "Database"). We will use the information in accordance with this Policy and any applicable law, including for the following purposes:

- To deliver the services on the Website and to enable you to use them;
- To deal with your requests, complaints and enquiries;
- To develop and improve our products and services as a whole, and to improve and expand the services and content offered on the Website, to create new services and content which correspond to the requirements and expectations of the users of the

Website and our customers and to modify or cancel existing services and content. The information used by the Company for this purpose will be mainly statistical information, and will not identify you personally;

- To contact you occasionally, either by the Company or by anyone on our behalf, including by sending email messages and information related to our services and products;
- To conduct researches and surveys and other similar activities related to products and services development;
- To analyze and provide statistical information to third parties. This information will not identify you personally;
- For the orderly and proper operation and development of the Website;
- To any other purpose specified in this Policy or in the Website's Terms of Use.

4. TRANSFER OF INFORMATION TO THIRD PARTIES

Your information will never be exchanged or sold. However, please keep in mind that we may share personal information outlined in this policy, with others, in any of the following instances:

- With our service providers in order to operate, maintain and enhance the Website and facilitate our email communications with you;
- Personal information pertaining to your application for open positions at Neocorp International Ltd (including your CV) may be shared with service providers we engage with to evaluate candidates. Their use of such information is strictly limited to this purpose;
- If you abused your rights to use the Website, or violated any applicable law, your information may be shared with authorities or other third parties, if we believe it is necessary or justified;
- With attorneys, courts and relevant third parties, in any case of dispute, or legal proceeding of any kind involving you with respect to the Website;
- If the operation of the Website is organized within a different framework, or through another legal structure or entity (such as due to a merger or acquisition), provided that those entities agree to be bound by the provisions of this policy, with reasonably necessary changes taken into consideration; and
- We may share personal information with our corporate group entities (companies that we control, control us, or are under common control with us, whether directly or indirectly), but their use of such information must comply with the policy.
- In any case other than above, your personal information will be shared with others only if you provide your explicit prior consent.

We make sure that your personal data is looked after as if we were handling it directly. In some cases, the companies that provide services to us might be established or run their services outside the European Economic Area. We only let that happen if we are satisfied with their levels of security. Keep in mind that when you give us personal information it could be transferred, stored or processed in a location outside the EEA.

5. FOR HOW LONG IS YOUR PERSONAL INFORMATION KEPT?

We will retain your personal information for as long as it is required or permitted by law or for as long as this is justified by the purpose of processing. After that period, personal data we hold about you will be erased securely.

6. CHILDREN'S DATA

Our website is not directed to children under the age of 18 years old. Nor do we knowingly collect information from them. In case we find out that we have collected personal information from a child without appropriate and verified parental consent, we will try our best to delete that information as soon as possible.

7. YOUR RIGHTS

You, as a data subject, have the following rights under the GDPR:

- a) The right to be informed. Anyone who processes your personal data, must inform you what data is processed, for what purpose and to whom else the data might pass.
- b) The right of access. You have the right to see what data is held of you by the data controller.
- c) The right to rectification. You can ask to correct or amend any false or incomplete personal data that is held of you.
- d) The right to erasure or also known as "the right to be forgotten". Under certain circumstances you can ask the controller to erase personal data concerning you without delay and the controller has the obligation to erase it without any delay.
- e) The right to restriction of processing. Under certain circumstances you have the right to ask the controller for a temporary halt of processing of personal data.
- f) The right to data portability. You have the right to receive the personal data concerning you and to transmit those data to another controller.
- g) The right to object. You have the right to object to further processing of your data which is inconsistent with the primary purpose for which it was collected, including profiling, automation, and direct marketing.
- h) Rights in relation to automated decision making and profiling. You have the right not to be subject to a decision based solely on automated processing.

You may contact us any time in order to:

- Confirm whether any of your personal information is held,
- Have access to any of your personal information and verify its accuracy,
- Correct and update your record with personal data, in case it is inaccurate,
- Erase data or cease processing provided that there are no legitimate grounds for retaining it.

Please note that unless you instruct us otherwise we retain the information we collect for as long as needed to provide the services and to comply with our legal obligations, resolve disputes and enforce our agreements.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

If you wish to raise a complaint on how we have handled your personal information, please contact us directly at

If you are not satisfied with our response or believe we are collecting or processing your Personal Information not in accordance with the laws, you may have a right to submit a complaint to the relevant supervisory data protection authority, pursuant to the law.

8. COOKIES AND OTHER TRACKERS

We use various types of cookies and other types of web trackers, which help us to administer and operate the Website.

A cookie is a small file that asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyze web traffic or lets you know when you visit a particular website. Cookies allow web applications to tailor their operations to your needs by gathering and remembering information about your preferences.

If you wish to block cookies, you may do so through your browser's settings. You can delete cookies that are already on your computer and you can set your browser to prevent them from being placed going forward. Please refer to the browser's help menu for further information.

Please also bear in mind that disabling cookies may adversely affect your user experience on the website.

We do not respond to browsers' "Do Not Track" requests.

9. LINKS TO OTHER WEBSITES

Our website may contain links to other websites that may be of interest to you. However, once you have clicked on these links and left our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting other websites which are not governed by this privacy notice. You should exercise caution and look at the privacy notice applicable to the website in question.

10. CHANGES TO THIS PRIVACY NOTICE

From time to time, the Company may change the terms of this policy. You agree to be bound by all changes made in the terms of this policy. Continuing to use the Website will indicate your acceptance of the amended terms. If you do not agree with any of the amended terms, you must avoid any further use of the Website.

Please visit this page often for the latest information on our privacy practices.

CONTACT US

You may contact us with any questions or comments, at: Hello@comaya.io