

1 Introduction

AC Goldman Solutions & Services GSS Ltd, is a company which was founded in 2013 and is active in the ICT sector covering a wide range of services. The company's main customers are banks, insurance companies, airlines, the Cyprus Government, and other large organizations.

In its everyday business operations AC Goldman Solutions Ltd (referred as "Goldman Solutions", the "Organisation") makes use of a variety of data of identifiable individuals, including data about:

- Current, past and prospective Employees
- Current, past and prospective Customers
- Other stakeholders

In collecting and using this data, the organisation is subject to various legislation controlling such activities and the safeguards that must be put in place to protect it. This policy outlines the relevant legislation, and the steps Goldman Solutions takes to ensure compliance.

This policy applies to all systems, people, and processes that constitute the organization's information systems, including board members, directors, employees, suppliers, and other third parties with access to Goldman Solutions systems.

2 Privacy and personal data protection policy

2.1.1 The General Data Protection Regulation

The General Data Protection Regulation 2016 (GDPR) is one of the most significant pieces of legislation affecting the way that Goldman carries out its information processing activities. Significant fines are applicable if a breach is deemed to have occurred under the GDPR, which is designed to protect the personal data of citizens of the European Union. It is Goldman's policy to ensure that our compliance with the GDPR and other relevant legislation is always clear and demonstrable.

2.1.2 Definitions

Personal data is defined as: *"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."*

Processing means: *"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 means: *“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; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.”*

2.1.3 Principles relating to processing of personal data

There are several fundamental principles upon which the GDPR is based.

These dictate that personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency').
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation').
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation').
4. Accurate and, where necessary, kept up to date ('accuracy')
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation').
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

In addition, the controller shall be responsible for, and be able to demonstrate compliance with all these principles ('accountability').

Goldman ensure that it complies with all these principles both in the processing it currently carries out and as part of the introduction of new methods of processing such as new IT systems. The operation of an information security management system (ISMS) that conforms to the ISO/IEC 27001 international standard is a key part of that commitment.

2.1.4 Data Collected and means of collection

Information can have various ways of being obtained, including but not limited to a) information data subjects provide us through our website or e-mail and/or b) information that we collect directly from our customers and employees.

Goldman collects, uses, stores, process and transfers different kinds of personal data about such as:

- Identity Data (Employees)
- Contact Data (Clients -Business Contact Details and Employees – Personal Contact Details)
- Financial Data (Employees)
- Technical Data (Log files only for employees)

- Usage Data

2.1.5 Lawful basis of processing

When processing personal data Goldman ensure that it is based in at least one of the following Lawful basis:

- **Consent:** The data subject has given consent to the processing of his or her personal data for one or more specific purposes
- **Contractual obligation:** Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
- **Legal obligation:** Processing is necessary for compliance with a legal obligation to which the controller is subject
- **Legitimate interest:** Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

2.1.6 Use of Data

Goldman collects your data for:

- The provision of services to the current and potential clients
- Onboarding and employment related purposes
- Improvement of the quality of services to natural/legal persons
- Research and statistical analysis
- Facilitation of technical administration
- Observation of online website behavior and trend
- Improvement of the quality of services and develop new ones

Goldman is dedicated to ensuring that personal data is processed securely and transparently. Our processing activities comply with applicable data protection laws and regulations, adhering to the following principles:

1. Lawfulness, Fairness, and Transparency:

We process personal data lawfully, fairly, and transparently. We provide clear information about our processing activities and obtain consent where necessary.

2. Purpose Limitation:

Personal data is collected for specific, explicit, and legitimate purposes and is not further processed in a manner that is incompatible with those purposes.

3. Data Minimization:

We ensure that the personal data we collect is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.

4. Accuracy:

We take reasonable steps to ensure that personal data is accurate and, where necessary, kept up to date. Inaccurate data is corrected or erased promptly.

5. Storage Limitation:

Personal data is retained in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.

6. Integrity and Confidentiality:

We process personal data in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical and organizational measures.

7. Accountability:

We are responsible for, and can demonstrate compliance with, these principles. We maintain records of processing activities and implement robust data protection policies.

Methods of Processing:

- **Manual Processing:** Personal data may also be processed manually by our trained staff, who handle data securely and confidentially.
- **Data Transfers:** Personal data may be transferred to third-party service providers who assist us in our operations. These providers comply with data protection laws and maintain a high level of data security.

2.1.7 Transfer of personal data

Goldman does not normally transfer Personal Data outside of the European Economic Community.

Where none of the appropriate safeguards are applicable, we may carry out the transfer on the basis of at least one of the specific situations, i.e. the data subject's specific consent, necessity for the performance of a contractual obligation etc. In addition, we will always take into account the relevant provisions under Cyprus Data Protection Law. In any event, we always make sure we take all reasonable and practicable measures to ensure the secure transfer in accordance with the GDPR.

2.1.8 Data retention

Goldman does not retain Personal Data in a form which may enable the direct or indirect identification of a Data Subject for longer than is necessary for the purposes for which the data is being processed or more than is provided for by specific legislation. Personal Data of clients and employees are retained as long as they are actively interacting and then archived and retained according to Laws, Regulations and internal policies. Goldman Solutions

implements all technical and organisational measures to safeguard the data for the full life cycle.

2.1.9 Data Deletion

Goldman deletes personal data when a) a reasonable data subject request occurs or b) the personal data are no longer required for operational, legislative or other, justifiable reasons. Consideration is also given as to whether information may be useful to the organization in anonymized form.

Methods of information deletion may vary according to the way in which the information is stored and may include:

- Automated deletion after a specified period of time (for example for email)
- Using secure deletion software to ensure that information may not be retrieved
- For information held on paper, shredding using a cross-cut shredder
- Physical destruction of storage devices such as hard drives
- Manual deletion of information once no longer required (for example, temporary files at the end of a project)
- Restoration of factory settings (for example in the case of a mobile device)

2.1.10 Rights of the individual

The data subject also has rights under the GDPR. These consist of:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

Each of these rights is supported by appropriate procedures within Goldman Solutions that allow the required action to be taken within the timescales stated in the GDPR. These timescales are shown in Table 1.

DATA SUBJECT REQUEST	TIMESCALE
The right to be informed	When data is collected (if supplied by data subject) or within one month (if not supplied by data subject)
The right of access	Within One month
The right to rectification	Within One month
The right to erasure	Within One month
The right to restrict processing	Within One month
The right to data portability	Within One month
The right to object	Within One month
Rights in relation to automated decision making and profiling.	Within One month

Table 1: Timescales for data subject requests

Other rights include: the right to be notified of a Personal Data Breach which is likely to result in high risk to your rights and freedoms; the right to make a complaint to the Supervisory Authority; the right to withdraw consent to Processing at any time.

Please note that these rights are not absolute and subject to exceptions. These therefore may be limited where Goldman has an overriding interest or legal obligation to continue to process the data or where data may be exempt from disclosure under applicable law. The applicability of data subjects' rights depends on the legal basis on which Goldman relies in each case.

The data subjects can request the exercise of their rights by sending e-mail to info@acgoldman.com.

If data subjects wish to raise a complaint on how Goldman handled their Personal Data, they may contact the Company to have the matter investigated.

If they are not satisfied with Goldman's response they may lodge a complaint to:

Office of The Commissioner for Personal Data Protection

Office address: Iasonos 1, 1082 Nicosia, Cyprus

Postal address: P.O.Box 23378, 1682 Nicosia, Cyprus

Tel: +357 22818456

Fax: +357 22304565

Email: commissioner@dataprotection.gov.cy

2.1.11 Privacy by design

Goldman takes all appropriate security measures to ensure that the personal data/data collected and stored in connection with your visit to the website and/or in relation to the services and products provided by Goldman is protected against any unauthorized access, misuse, loss and/or destruction.

Goldman uses physical and electronic security measures, including but not limited to the use of firewalls, personal passwords, encryption and authentication technologies. Windsor Brokers' employees and service providers are bound by professional secrecy and must comply with all data protection provisions.

It is to be noted, that access to personal data is restricted to specific employees, contractors and third-party service providers who require this access in order to process the agreement between Goldman and you, all on a "need to know" basis and to be able to execute all obligations emanating from the agreements in place. Use of techniques such as data minimization and pseudonymisation will be considered where applicable and appropriate.

2.1.12 Data protection officer

A defined role of Data Protection Officer (DPO) is not required under the GDPR if an organization does not perform large scale of monitoring or if it does not process particularly sensitive types of data on a large scale.

Based on these criteria, Goldman has not appointed a DPO, hence it has taken all the appropriate measures to ensure data protection is applied and every issue that may occur is handled directly through the Information Security Officer.

3 Self-Assessment of Legal Compliance

Goldman conducts a self-assessment regarding personal data and its compliance with relevant legal provisions. This self-assessment is carried out using appropriate methodologies developed by the organization or from a reliable external source. The self-assessment is repeated annually, with results retained and necessary compliance measures implemented.

4 Review and Update of Data Protection Policy

Goldman Solutions reviews and updates its Data Protection at least annually or when a significant change to the processing activities occurs.

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