

Privacy Policy

This policy:

- provides an overview of how Praelino Trading Ltd collects and processes your personal data and tells you about your rights under the local data protection law and the EU General Data Protection Regulation ('GDPR'),
- is directed to and applies to persons who are either current or potential clients of the services of the Company, users of this website, candidates, suppliers and other people who we may contact in order to find out more about our candidates.
- contains information about when we share your personal data with third parties.

In this policy your data is sometimes called "personal data" or "personal information". We may also sometimes collectively refer to handling, collecting, protecting and storing your personal data or any such action as "processing" such personal data.

For the purposes of this policy, personal data shall mean any information relating to you which identifies or may identify you and which includes, for example, your name, address, identification number.

1. Who we are

Praelino Trading Ltd is a private company limited by shares incorporated in Cyprus having its registered office and head offices in Engomi, Nicosia and is the data controller and processor of information collected through this website. **Praelino Trading Ltd** (referred to as 'we', 'us', 'our', 'Praelino' or the 'Company') is committed to protecting your privacy and handling your data in an open and transparent manner.

If you have any questions, or want more details about how we use your personal information, you can contact us on email info@lavoria.com .

2. What personal data we process and where we collect it from

Clients (prospective employers/employers): We collect and process different types of personal data (including but not limited to first, middle and last name of contact person, name of company and its directors, e-mail, phone number, city and country) which we receive from our clients (prospective and existing) in person or via their representative, in the context of providing you with services such as finding the best available candidates for your opportunities /vacancies.

We may also collect and process personal data which we lawfully obtain not only from you but from other entities or persons or other third parties, public authorities, companies that introduce you to us.

We may also collect and process personal data from publicly available sources (e.g. the Department of Registrar of Companies and Official Receiver, the Land Registry, the Bankruptcy Archive, commercial registers, the press, media and the Internet) which we lawfully obtain and we are permitted to process.

Candidates: We collect and use data necessary to be able to find the best available opportunities and any further information needed to assess your eligibility through the different stages of recruitment. This information includes CVs, resume, identification documents, phone numbers, birth date, first, middle and

last names, gender, educational records, work history, employment and position, references, financial information and links to SNSs (Social Networking Services). Information may also be collected through publicly available sources, for example, LinkedIn, job boards, by reference or word of mouth (you may be recommended by a friend, a former employer, a former colleague or even a current employer).

We may also collect sensitive personal data about you, related to your health, diversity information or details of any criminal convictions. We only collect sensitive personal data from you, and further process this data, where you have given your explicit consent.

Website Users: this term includes clients and candidates, in addition to users of the website. We collect and use only the information necessary to improve your experience when using our website. This may include how, when and how often you visit us.

The relevant personal data which we collect may include:

Name, address, contact details (telephone, email), identification data, birth date, place of birth (city and country), marital status, employed/self-employed.

We collect the personal data from our website, mobile application (for candidates) and CRM (Customer Relationship Management) form for employers/prospective employers.

3. Why we process your personal data and on what legal basis

We process your personal data in accordance with the GDPR and the local data protection law for one or more of the following reasons:

- **For the performance of a contract**
We process personal data in order to provide services based on contracts with our clients but also to be able to complete our acceptance procedure so as to enter into a contract with prospective clients.
The purpose of processing personal data depends on the requirements for each product or service and the contract terms and conditions provide more details of the relevant purposes.
- **For our legitimate interests**
For prospective candidates, contractors and clients our processing is necessary for our legitimate interests – we need this information in order to be able to assess suitability for potential roles, to find potential candidates and to contact clients and suppliers.
- **You have provided your consent**
Provided that you have given us your specific consent for processing (other than for the reasons set out hereinabove) then the lawfulness of such processing is based on that consent. You have the right to revoke consent at any time. However, any processing of personal data prior to the receipt of your revocation will not be affected.

4. Who receives your personal data

In the course of the performance of our contractual and statutory obligations your personal data may be provided to prospective employers primarily in the hotel and restaurant industry. Various service providers and suppliers may also receive your personal data so that we may perform our obligations. The

prospective employer may contact you directly by connecting with you as a candidate by chat, telephone or online means.

It must be noted that we may disclose data about you for any of the reasons set out hereinabove, or if we are legally required to do so, or if we are authorized under our contractual and statutory obligations or if you have given your consent. All data processors appointed by us to process personal data on our behalf are bound by contract to comply with the GDPR provisions.

5. Transfer of your personal data to a third country

Your personal data will not be transferred to third countries [i.e. countries outside of the European Economic Area] unless required by law or you have provided your consent.

6. To what extent there is automated decision-making and whether profiling takes place

In establishing and carrying out a business relationship, we generally do not use any automated decision-making. We may process some of your data automatically, with the goal of assessing certain personal aspects (profiling), in order to enter into or perform a contract with you.

7. How we use your information and how we treat your personal data for marketing activities and whether profiling is used for such activities

Candidates: We use your personal data to match your skills and experience with a potential employer. We will initially collect basic information on you such as contact details, job role and experience and then pass this on to the client in search of personnel. If you are chosen by the client and go through to the next stage we will then be collecting more information from you at the interview (or equivalent) stage and onwards in that manner. We may use your data to send you information that you may find interesting such as suggesting other jobs to you.

Clients: We use your personal data to ensure that we can find the right candidate for the opportunities that you may have or for contractual obligations.

All users: We may process your personal data to tell you about services that may be of interest to you or your business.

The personal data that we process for this purpose consists of information you provide to us and data we collect and/or infer when you use our services, such as information on your transactions. We study all such information to form a view on what we think you may need or what may interest you. In some cases, profiling is used, i.e. we process your data automatically with the aim of evaluating certain personal aspects in order to provide you with targeted marketing information on products.

We can only use your personal data to promote our products and services to you if we have your explicit consent to do so or, in certain cases, if we consider that it is in our legitimate interest to do so.

You have the right to object at any time to the processing of your personal data for marketing purposes, which includes profiling, by contacting us.

8. How long we keep your personal information for

We will only retain your information for as long as is necessary for us to use your information as described herein or to comply with our legal obligations. We may retain some of your information after you cease to use our services if we believe in good faith that it is necessary to meet our legal obligations. The personal information shall be erased after a year from the date of your last consent provided to Praelino.

For prospective customer personal data [or authorized representatives/agents or beneficial owners of a legal entity prospective customer] we shall keep your personal data for 6 months from the date of notification of the rejection of your application or from the date of withdrawal of such application, as per Data Protection Commissioner directive (<http://www.dataprotection.gov.cy>).

9. Your data protection rights

You have the following rights in terms of your personal data we hold about you:

- **Receive access to your personal data.** This enables you to e.g. receive a copy of the personal data we hold about you and to check that we are lawfully processing it. In order to receive such a copy you can complete our web form through our website (<http://www.lavoria.com>).
- **Request correction [rectification]** of the personal data we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request erasure of your personal information.** This enables you to ask us to erase your personal data [known as the 'right to be forgotten'] where there is no good reason for us continuing to process it.
- **Object to processing of your personal data** where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. If you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms.

You also have the right to object where we are processing your personal data, for direct marketing purposes. This also includes profiling in as much as it is related to direct marketing.

If you object to processing for direct marketing purposes, then we shall stop the processing of your personal data for such purposes.

- **Request the restriction of processing** of your personal data. This enables you to ask us to restrict the processing of your personal data, i.e. use it only for certain things, if:
 - it is not accurate,
 - it has been used unlawfully but you do not wish for us to delete it,

-it is not relevant any more, but you want us to keep it for use in possible legal claims,

-you have already asked us to stop using your personal data but you are waiting for us to confirm if we have legitimate grounds to use your data.

- **Request to receive a copy** of the personal data concerning you in a format that is structured and commonly used and transmit such data to other organizations. You also have the right to have your personal data transmitted directly by ourselves to other organizations you will name [known as the right to data portability].
- **Withdraw the consent that you gave us** with regard to the processing of your personal data at any time. Note that any withdrawal of consent shall not affect the lawfulness of processing based on consent before it was withdrawn or revoked by you.

To exercise any of your rights, or if you have any other questions about our use of your personal data, please contact (<http://info@lavoria.com>)

We endeavour to address all of your requests promptly.

- **Right to lodge a complaint**

If you have exercised any or all of your data protection rights and still feel that your concerns about how we use your personal data have not been adequately addressed by us, you have the right to complain by completing our on line contact form (<http://info@lavoria.com>). You also have the right to complain to the Office of the Commissioner for Personal Data Protection. Find out on their website how to submit a complaint (<http://www.dataprotection.gov.cy>).

10. Changes to this privacy statement

We may modify or amend this privacy statement from time to time.

We will notify you appropriately when we make changes to this privacy statement and we will amend the revision date at the top of this page. We do however encourage you to review this statement periodically so as to always be informed about how we are processing and protecting your personal information.

11. Cookies

Our website uses small files known as cookies to make it work better in order to improve your experience.