

Privacy and Data Processing Policy

Last Updated: July 10, 2025

Version: 1.0

1. Introduction

Welcome to AGENCYZ TRADING LTD ("we," "us," or "our"). We are committed to protecting and respecting your privacy. This policy explains how we collect, use, and protect the personal data of our customers and website visitors ("you") in connection with the services we provide through our website, <https://agencyz.eu/> (the "Site").

This policy is designed to comply with the EU General Data Protection Regulation (GDPR) and the Cypriot Law 125(I)/2018 for the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such Data.

Data Controller:

The data controller responsible for your personal data is:

- **Company Name:** AGENCYZ TRADING LTD
- **Company Registration Number:** HE 394232
- **Address:** 4, Kleanthi Mesologgiti, Larnaca, 6051, Cyprus
- **Email:** support.eu@agencyz.com
- **Data Protection Contact:** support.eu@agencyz.com

2. The Data We Collect About You

Personal data means any information about an individual from which that person can be identified. We may collect, use, store, and transfer different kinds of personal data about you, which we have grouped together as follows, based on the information you provide and our operations :

- **Identity Data:** Includes surname, first name, patronymic, gender, date of birth, and passport data (only when required for processing a formal claim).
- **Contact Data:** Includes billing address, delivery address(es), email address, and contact phone number(s).
- **Financial Data:** Includes bank details and payment card details. (Note: We use secure third-party payment gateways to process payments. We do not store your full payment card details on our servers).
- **Transaction Data:** Includes details about payments, information about goods and services you have purchased from us, and your order history.
- **Profile Data:** Includes your User ID, social media profiles (if you provide them),

and other information you provide when filling out your personal account on the Site.

- **Technical Data:** Includes your internet protocol (IP) address, information from cookies, information about your browser, access time, and the address of the requested page.
- **Marketing and Communications Data:** Includes your consent and preferences for receiving advertising and marketing materials from us
- **User-Provided Data:** Includes any additional information you provide when submitting claims or other applications to the Company.¹

We do not knowingly collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, genetic data, or biometric data for the purpose of uniquely identifying you).

3. How Is Your Personal Data Collected?

We use different methods to collect data from and about you, including:

- **Direct interactions:** You provide us with your data by registering on the Site, placing an order, filling in forms, or corresponding with us by post, phone, or email. This includes data you provide when you:
 - Create an account on our Site.
 - Purchase our products or services.
 - Consent to receive marketing materials.
 - Contact us with a claim or inquiry.
- **Automated technologies or interactions:** As you interact with our Site, we automatically collect Technical Data using metric programs and cookies. Please see our **Cookie Policy** for further details.
- **Third parties:** We may receive personal data about you from various third parties, such as payment and delivery services (e.g., DHL, FEDEX) that help us fulfill your orders.

4. How We Use Your Personal Data and Our Legal Basis

We will only use your personal data when the law allows us to. The table below details the purposes for which we process your data and the GDPR lawful basis we rely on for each activity:

Purpose/Activity	Types of Data	Lawful Basis for Processing
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To register you as a new customer and manage your personal account.	Identity, Contact, Profile, Technical	Performance of a contract (our User Agreement with you).
To process and deliver your order, including managing payments, fulfilling the delivery, and handling returns.	Identity, Contact, Financial, Transaction	Performance of a contract.
To manage our relationship with you, including notifying you about order status or changes to our terms or this policy.	Identity, Contact, Transaction, Profile	Performance of a contract; Legitimate Interest (to keep our records updated and inform you of important changes).
To administer and protect our business and this Site (including troubleshooting, data analysis, security, and system maintenance).	Identity, Contact, Technical	Legitimate Interest (for running our business, providing IT services, and ensuring network security).
To review and resolve claims or other applications you submit.	Identity, Contact, Transaction, Passport Data, User-Provided Data	Legal obligation; Legitimate Interest (to resolve disputes and improve our service).
To send you marketing communications (e.g., newsletters, special offers) via email, SMS, or other channels you select.	Identity, Contact, Marketing & Communications	Consent (which you can withdraw at any time).
To promote goods and services through direct contact by us or an appointed "Curator".	Identity, Contact	Consent (which you can withdraw at any time).
To ensure the proper technical functioning of the Site and improve user experience.	Technical	Legitimate Interest (to ensure our Site is working correctly and to plan for improvements).

To comply with legal and regulatory obligations (e.g., tax and accounting laws).	Identity, Contact, Financial, Transaction	Legal obligation.
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5. Disclosures of Your Personal Data

We may need to share your personal data with the parties set out below for the purposes detailed in the table above:

- **Payment Service Providers:** To process your payments for orders. Our payment options include bank card, Google Pay, Apple Pay, and PayPal.
- **Delivery and Courier Services:** To deliver your orders to you (e.g., DHL, FEDEX, and operators of automated terminals).
- **IT Service Providers and Website Maintenance Partners:** Who provide system administration, website development, and maintenance services. These partners act as our data processors under a formal agreement.
- **Marketing Partners ("Curators"):** With your explicit consent, we may share your contact details with a designated partner (Curator) to provide you with personal offers and information about our products.
- **Professional Advisers:** Including lawyers, bankers, auditors, and insurers based in Cyprus who provide consultancy, banking, legal, insurance, and accounting services.
- **Regulators and other authorities:** Such as the Tax Department of the Republic of Cyprus, who may require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process it in accordance with our instructions.

6. Data Security

We have implemented appropriate technical and organizational security measures to prevent your personal data from being accidentally lost, used, accessed in an unauthorized way, altered, or disclosed. These measures include data encryption, firewalls, and secure access protocols.

In addition, we limit access to your personal data to those employees and third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have procedures to deal with any suspected personal data breach and will notify you and the Cyprus Office of the Commissioner for Personal Data Protection of a breach where we are legally required to do so.

7. Data Retention

We will only retain your personal data for as long as is reasonably necessary to fulfil the purposes we collected it for, including for satisfying any legal, regulatory, tax, accounting, or reporting requirements.

- **Account Data:** We will retain your profile and account data for as long as your account is active or for a period of three (3) years from the date of your last authorization on the Site, whichever comes first, unless you request its deletion earlier.
- **Transaction Data:** By law, we must keep basic information about our customers (including Contact, Identity, Financial, and Transaction Data) for at least six years after they cease being customers for tax and legal purposes.
- **Marketing Consents:** If you have consented to receive marketing, we will retain the relevant data until you withdraw your consent.

Upon expiry of the retention period or upon your valid request for erasure, we will securely destroy your personal data in accordance with applicable laws.

8. Your Legal Rights

Under GDPR, you have the following rights in relation to your personal data:

- **Right to be informed:** To be provided with clear, transparent, and easily understandable information about how we use your information and your rights.
- **Right of access:** To request a copy of the personal data we hold about you.
- **Right to rectification:** To request the correction of inaccurate or incomplete personal data.
- **Right to erasure:** To request the deletion of your personal data where there is no compelling reason for us to keep using it (the "right to be forgotten").
- **Right to restrict processing:** To 'block' or suppress further use of your information.
- **Right to data portability:** To obtain and reuse your personal data for your own purposes across different services.
- **Right to object:** To object to certain types of processing, including for direct marketing.
- **Right to withdraw consent:** To withdraw your consent at any time where we are relying on consent to process your personal data.

To exercise any of these rights, or to withdraw your consent, please contact us by sending a written application to our address or email:

- **By Post:** AGENCYZ TRADING LTD, 4, Kleanthi Mesologgiti, Larnaca, 6051, Cyprus
- **By Email:** support.eu@agencyz.com

9. Changes to This Privacy Policy

We keep our privacy policy under regular review. Any changes will be posted on this page, and, where appropriate, you may be notified by email. This version was last updated on the date shown at the top of this policy