Privacy Policy for Procurement

EuroAfrica Interconnector Limited (HE 348576)

1. Introduction

This Privacy Policy (the "Policy") set out below will govern the protection and processing of your personal data which is collected and processed by EuroAfrica Interconnector Limited ("we" or "us") in case you are a Candidate for Works, Candidate for Services, Candidate for Supplies, Collaborator or Client or an Interested Party ("you").

EuroAfrica Interconnector Limited is a limited liability company registered at Philippou 25, Quantum Tower, Agios Dometios, 2363, Nicosia, Cyprus.

Please read this Policy carefully. By accepting to provide your services to us and by signing any relevant documents directing you to this policy, you are deemed to have read, understood, agreed to and consented to this Policy.

1.1. Controller

Any information (including personal data) submitted to us by a Candidate for Works, Candidate for Services, Candidate for Supplies, Collaborator or Client or an Interested Party, will be handled by us and transmitted to us.

1.2. Definitions

Candidate for Works means a company or other entity who has applied through a procurement process to provide its works to us.

Candidate for Services means a company or other entity who has applied through a procurement process to provide its services to us.

Candidate for Supplies means a company or other entity which has applied through a procurement process to provide its supplies/products to us.

Candidate means any one or a combination of Candidates for Works, Services and Supplies as well as their employees or other physical persons in their workforce.

Collaborator or Client means a company or other entity assisting us or working with us during the procurement process and during the completion of a project.

Interested Parties means the physical persons involved in the public consultations which take place by us prior to or at the stage of the initiation of Works, Services or Supplies by Collaborators.

Personal data includes personal data of any physical person such as employees or any other person authorising the Candidates or Collaborators to disclose such data.

2. Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

a) Used lawfully, fairly and in a transparent way.

b) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.

c) Relevant to the purposes we have told you about and limited only to those purposes.

d) Accurate and kept up to date.

e) Kept only as long as necessary for the purposes we have told you about.

f) Kept securely.

3. Collection of personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about

the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the tables below.

How is your personal data collected?

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

- Direct interactions from Candidates for Collaboration for Services or Works and Collaborators for Services, Works or Supplies, Interested Parties or other Collaborators: You may give us personal details by contacting us through the post, telephone, e-mail, our website or through any other means (such as personally when you give to us your business card).
- Indirect Interactions from Candidates for Collaboration for Services or Works and Collaborators for Services, Works or Supplies, Interested Parties or other Collaborators: We may collect information through 3rd parties such as procurement platforms.

In case we collect information through any other means we will mention this in this privacy policy.

Data retention: How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

3.1. We collect personal information at the following stages

3.1.1. In relation to accommodating you

Collecting information from Collaborators or Clients: In case we accommodate you (for example by booking a plane ticket for you or making arrangements for you) we will collect personal data from you directly through telephone or e-mail.

DATA ITEM	DATA SUBJECT	LAWFUL BASIS OF PROCESSING	RETENTION PERIOD
Name	Client/Collaborator or Employee of Client/Collaborator	The collection of personal data is necessary for fulfilling a contractual obligation: namely booking plane tickets. Legitimate Interests of our own or those of third parties in performing our business and in maintaining our business relations.	7 years after the booking.
Nationality			
Place of Birth			
Date of Birth			
Sex			
Date of Issue			
Date of Expiry			
Passport Number			
Signature			
Authority of issue			
Telephone Number			
Address			
Member Card Details			
E-mail			

Using the information of Clients or Collaborators in order to book plane tickets and taxis

We will use the personal details mentioned above and transmit them to third parties (such as travel agents or taxi companies) for the purposes of booking the tickets and the taxi from the airport.

3.1.2. In relation to procurement for works, services or supplies

We may use different methods of collection of personal data at different stages of any procurement process.

Collecting and using contact persons' information for Candidates

We receive personal data relating to Candidates directly or through 3rd party associates. We may use this data in order to contact Candidates for the purposes of informing them about the procurement process and in order to observe whether they fulfil the criteria for a specific contract.

DATA ITEM	DATA SUBJECT	LAWFUL BASIS OF PROCESSING	RETENTION PERIOD
Name E-mail Position Telephone Fax	Employee of Candidate	The collection of personal data is necessary for fulfilling pre-contractual obligations with economic operators. Legitimate Interests of our own or those of third parties in that we need to collect information of eligible candidates.	7 years after a Candidate for Works was unsuccessful **or** for successful Candidates, for the whole period of the project and for 10 years after completion.

We might also keep printed copies of the personal data which we will store safely in our offices.

Collecting personal data after the initiation of the contract in the official journal of the EU in relation to Candidates for Works, evaluating them

We will collect various forms which contain personal data of employees of the Candidates for Works. The forms which we will use are the Request to Participate, the Certification Regarding the Protection of Employees, Solemn Declaration Certifying the Candidate's Personal Situation and the Declaration of other Entities Form.

DATA ITEM	DATA SUBJECT	LAWFUL BASIS OF PROCESSING	RETENTION PERIOD
Name E-mail Position Telephone Fax Copy of ID/Passport Signature Address Full ID/Passport	Employee of Candidate	The collection of personal data is necessary for fulfilling pre-contractual obligations with economic operators. Legitimate Interests of our own or those of third parties in that we need to collect information of eligible candidates.	7 years after a Candidate for procurement was unsuccessful **or** for successful Candidates, for the whole period of the project and for 10 years after completion.

We will collect the above personal data through:

a) 3rd party platforms where the forms will be submitted by you and will be collected by us and our third party collaborators and/or

b) the post in paper copy as well as in an electronic form (USB, DVD, CD or other Durable Medium).

The abovementioned personal data will also be shared with other third party collaborators in the process of evaluating of your Request to Participate.

Contacting unsuccessful candidates (for the invitation to tender)

After this evaluation, we will use the abovementioned contact data in order to contact unsuccessful Candidates and inform them that they were unsuccessful.

Contacting successful candidates (for the invitation to tender)

In relation to successful Candidates, we will use the abovementioned contact data in order to inform them that they were successful and simultaneously or at a later stage we will send them an "Invitation to Tender". The Invitation to Tender is sent to Successful Candidates through 3rd party platforms.

Receiving the Technical and Financial Offer

After a Candidate receives an Invitation to Tender we will receive together with the Technical and Financial Offer of the Candidate, personal data relating to CV details of its Employees as well as its contact persons personal details.

DATA ITEM	DATA SUBJECT	LAWFUL BASIS OF PROCESSING	RETENTION PERIOD
CV details (such as name, surname, ID, date of Birth, education, position, membership of professional bodies, professional experience, skills, languages, photograph, previous experience, previous employers, current employer, hobbies etc)	Employee of Procurement Candidates of Works	The collection of personal data is necessary for fulfilling pre-contractual obligations with economic operators. Legitimate Interests of our own or those of third parties in that we need to collect information of eligible candidates.	7 years after a Candidate was unsuccessful **or** for successful Candidates, for the whole period of the project and for 10 years after completion.
Contact Details			

These personal data will be received electronically through 3rd party platforms. The abovementioned personal data might also be shared with other third-party collaborators in the process of evaluating the Technical and Financial Offer.

We might also receive this information in hard copy form and will secure them safely in locked cabinets.

3.1.3. In relation to successful procurement candidates

Collecting deliverables: In case a Candidate is successful in procurement, we will store all the above information in both electronic and hard copy form and will keep it secure for a period of 10 years after completion of the project. We may share such information with our third-party collaborators.

3.1.4. In relation to all other enquiries

When you contact us via e-mail or when we contact you via e-mail we may use information such as your name and surname, email, telephone number and details of your email. We will use this as it is necessary for our legitimate interests i.e. to respond to someone's request and to keep track of what has been enquired. We will store data in relation to communication with another person 6 years after the end of the communication with the said person.

Marketing

We do not plan to market or use your personal data for marketing or advertising purposes.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Special Categories of Data

We do not collect special categories of data.

4. Disclosures of your personal data

We will share your personal information with other entities in our group and/or to our strategic consultants. Also, we might share your personal data where companies of the group are acting as Data Processors in relation to your personal data. Please contact us in case you wish to find out more on 3rd parties involved in the process of collection and use of your data.

5. International transfers

We take care so as not to transfer any of your data outside the European Economic Area. In case we do transfer your data outside of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least that we use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

6. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other 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 put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Changes to the policy

We reserve the right, at our discretion, to make changes to any part of this Policy. Should this Policy be amended, we will publish details of the amendments on the Website.

8. Severability

If this Policy or any part of it should be determined to be illegal, invalid or otherwise unenforceable under the laws of any country in which this Policy is intended to be effective, then to the extent that it is determined to be illegal, invalid or unenforceable, it shall in that country be treated as severed and deleted from this Policy and the remaining terms of this Policy shall

survive and remain in full force and effect and continue to be binding and enforceable in that country.

9. Events beyond our control

We are not responsible for any breach of this Policy caused by circumstances beyond its reasonable control.

10. Your rights

If you submit or have already provided us with personal data about you, then you have the following rights under this Policy and the relevant legislation on the protection on personal data.

You may at any time cancel the consent you have given us to process your personal data.

You may at any time send us any of the following requests:

- A request for us to permanently delete all or some of your personal data from our records.
- A request for you to access your personal data that are in our records.
- A request for us to provide you with a copy of your personal data that are in our records, in digital or hard copy form.
- A request for us to update or correct your personal data that are in our records.
- A request for us to forward to another party of your choosing, a copy of all or some of your personal data that are in our records.
- A request for us to limit what we do with your personal data or to stop all processing of your personal data.

If you wish to exercise any of the above rights or if you wish to notify us of a breach of your personal data, you will be able to do so by contacting us at any of the following:

Address: Kyriakou Matsi 16, Eagle House, 8th Floor, 1082, Agioi Omologites, Nicosia, Cyprus.

Tel: +357 22510165

Fax: +357 22318214

Email: dataprotection@dhadjinestoros.com

You also have a right to lodge a complaint with the supervisory authority, The Office of the Commissioner for the protection of personal data, however we would appreciate the chance to deal with your concerns before you approach the supervisory authority.

At any time after providing your consent, you will have a right to withdraw it by visiting any of our offices or by contacting us electronically or in writing using the above contact details.

11. Contacting our DPO or the Office of the Commissioner

Our appointed Data Protection Officer is D. Hadjinestoros & Co LLC who can be contacted at:

Address: Kyriakou Matsi 16, Eagle House, 8th Floor, 1082, Nicosia, Cyprus

Tel: +357 22510165

Fax: +357 22318214

Email: evripidesh@dhadjinestoros.com

The competent authority in Cyprus for the enforcement of personal data protection legislation is The Office of the Commissioner for the protection of personal data:

Address: Iasonos 1, 1082 Nicosia Cyprus or P.O. Box 23378, 1682 Nicosia Cyprus

Telephone: +357 22818456

Fax: +357 22304565

Email: commissioner@dataprotection.gov.cy