

Privacy Policy

Website: waterythm.com

1. SCOPE OF POLICY APPLICATION

WATERYTHM TRADING LIMITED ("Waterythm", "we", "us", "our") places great importance on protecting the privacy of our users. This Privacy Policy (the "Policy") explains how we collect, use, disclose, and safeguard personal data in connection with our website <https://waterythm.com/> (the "Website").

Terms used but not defined in this Policy have the meaning given in our Terms and Conditions.

We apply the principles of data minimisation and purpose limitation. We only collect and use information to the extent necessary to operate the Website and provide high-quality services.

2. COMPLIANCE WITH GDPR

For the purposes of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR"), Waterythm acts as a data controller. This means we determine (alone or jointly with others) the purposes and means of processing personal data.

3. DEFINITION OF PERSONAL DATA

"Personal data" means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an identifiable individual user of the Website.

4. PROCESSING OF PERSONAL DATA

"Processing" means any operation performed on personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval,

consultation, use, disclosure, dissemination, alignment or combination, restriction, erasure, or destruction.

5. PERSONAL DATA PROCESSED AND LEGAL BASIS

5.1. We do not intentionally collect or process sensitive personal data, such as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data, data concerning a person's sex life or sexual orientation, or criminal convictions and offences.

5.2. By default, we also do not collect or process "regular" personal data such as an email address, phone number, or identification number.

5.3. If you provide us with information that constitutes (or later becomes) personal data, we will process that data on one or more of the following legal bases, as applicable:

- your consent (Article 6(1)(a) GDPR);
- the necessity to perform a contract or to take steps at your request prior to entering into a contract (Article 6(1)(b) GDPR); and/or
- our legitimate interests (Article 6(1)(f) GDPR).

Where processing is based on consent, you may withdraw your consent at any time. In all cases, you may have specific rights as a data subject (see Section 11), including the right to erasure and the right to object/opt out.

6. DATA SECURITY MEASURES

We apply appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access. These measures are proportionate to the nature of the data and the risks involved.

7. INTERNATIONAL DATA TRANSFERS

Some of our third-party service providers may be located outside the European Economic Area, including in the United States. Where personal data is transferred outside the EEA, we use appropriate safeguards, such as standard contractual clauses approved by the European Commission, and/or other lawful transfer mechanisms, as required by GDPR.

8. AUTOMATED PROCESSING AND PROFILING

We do not carry out automated decision-making (including profiling) based on personal data provided by users that produces legal effects concerning you or similarly significantly affects you.

9. PERSONAL DATA RETENTION PERIOD

We retain personal data only for as long as necessary for the purposes for which it was collected and processed, and in line with applicable legal requirements. Retention depends on the legal basis for processing:

- 9.1. Consent-based processing: until consent is withdrawn (unless another lawful basis applies).
- 9.2. Contractual necessity: until the contract expires or is terminated, plus an additional 6 (six) years.
- 9.3. Legitimate interests: until the legitimate interest ceases or you object, whichever occurs first.
- 9.4. Maximum/general retention: where no legal and/or contractual obligations apply, we retain data for a maximum of 10 (ten) years.

10. DISCLOSURE TO THIRD PARTIES

We may engage third parties to process personal data on our behalf under written agreements that require confidentiality and appropriate security. Such third parties may include:

- 10.1. Data security providers (services, software, and/or hardware).
- 10.2. Analytics service providers.
- 10.3. Hosting service providers.
- 10.4. Marketing representatives.
- 10.5. Subcontractors and survey providers.

10.6. Legal, financial, and business advisors.

In these cases, Waterythm remains the data controller and the third parties act as data processors.

11. USERS RIGHTS UNDER GDPR

If we process your personal data, you may be entitled to the following rights (subject to applicable conditions and limitations):

11.1. Right of access.

11.2. Right to rectification.

11.3. Right to erasure (“right to be forgotten”).

11.4. Right to data portability.

11.5. Right to object to processing.

11.6. Right to withdraw consent at any time (where processing is based on consent).

11.7. Right to restrict processing.

11.8. Right to lodge a complaint with a competent data protection authority.

12. EXERCISING USER RIGHTS

12.1. To exercise the rights set out in Sections 11.1 to 11.7, please contact us using the details in Section 13.

12.2. To exercise the right set out in Section 11.8, you may contact your national data protection authority. A list of EU/EEA authorities is available at: https://www.edpb.europa.eu/about-edpb/about-edpb/members_en#.

13. CONTACT DETAILS

The data controller is WATERYTHM TRADING LIMITED, with business premises at Kosta Varnali 53, 2232, Latsia, Nicosia, Cyprus, registration number 424415 .

You can contact us at: office@waterythm.info.com

14. POLICY UPDATES

We may update this Policy from time to time, for example due to technological developments, changes to our services, or legal and regulatory updates. Where required, we will provide notice of material changes via the Website.