

PEOPLE DATA PRIVACY POLICY

Last update: 03.07.2025

This People Data Privacy Policy (**this Notice**) is intended to ensure that You are aware of what personal data SMARTDYNAMICS group of companies (**hereinafter, “SMARTDYNAMICS Group”, we, us, our**), holds in relation to You, and how we use that data as data controller.

For the purposes of this Notice, **SMARTDYNAMICS Group** includes, in particular:

SMARTDYNAMICS LIMITED, registration number HE 399424, address: Omonoias 13, 3052 Limassol, Cyprus;

KADAM CY Ltd, registration number HE 424427, address: Omonoias 13, 3052 Limassol, Cyprus;

Kadam Advertising Ltd, registration number HE 441056, address: Omonoias 13, 3052 Limassol, Cyprus.

Please read the following carefully to understand our use of Your Personal Data.

Scope

This Notice applies to You and to third parties whose information You provide to us in connection with our relationship with You (for example, in respect of emergency contact information). Please ensure that You provide a copy of this Notice to any third parties whose personal data You provide to us.

When we refer to 'Employment' in this Notice, we do so for convenience only, and this should in no way be interpreted as purporting to confer employment status on Workers and/or Candidates to whom this Notice also applies. This Notice does not form part of any contract of employment and does not confer any contractual right on You or place any contractual obligation on us.

This Notice applies to all personal data collected, maintained, transmitted, stored, retained, or otherwise used (i.e. processed) by us regardless of the media on which that personal data is stored. We may update this Notice at any time and will notify You in writing of any changes.

Definitions

'**Personal Data**' is defined as any data relating to a living individual who can be identified directly from that data or indirectly in conjunction with other information. We hold some or all of the types of personal data set out below, in relation to You;

“**You**” means Employee or Worker, or Candidate;

“**Employee**” means person with whom we conclude employment agreement;

“**Worker**” means consultant, individual contractor, agency worker;

“**Candidate**” means a current (or former) applicant.

General Personal Data:

- **Personal**- contact/identifying details including name, address, email address, date of birth, civil status, gender, nationality, domestic partners, dependents;
- **Emergency Contact** - name and contact details of emergency contacts (as set out above, You must provide a copy of this Notice to any third parties whose personal data You provide to us);
- **Professional** - Curriculum Vitae and/or application form, pre-employment questionnaire, previous employment background, references from previous employers, previous working background, references from previous customers, record of interview/interview notes, selection and verification records, educational details, professional and/or academic transcripts, professional certifications, special skills, licenses (including but not limited to driver license), language skills, memberships of committees or other bodies;
- **Financial** - salary and benefit details including bank details, personal identification number, tax information;
- **Employment** - work contact details (corporate email address and telephone number), identification number, details regarding the job function, primary work location, working hours, employment status, Your terms and conditions of employment or engagement, contract of employment, independent contractor agreement, signed confidentiality agreement, immigration status, work permit details, job description, history and details of current position and photographs which may be taken at SMARTDYNAMICS Group events;
- **Contractor** – details of hiring agency, identifying details including name, address, email address, title, start date, termination date, location, manager, hourly rate of pay and number of hours worked per week;
- **Premises and IT access** - information required to access company systems and applications such as email account and system passwords, login and access records, download and print records, call recordings, records of email and internet usage in accordance with our email and internet policy, CCTV images captured by landlord in accordance with their legitimate interest, if applicable;
- **Fees, remuneration and benefits** – fees/payment and benefits package, base salary, bonus, compensation type, long term incentives, pension scheme, health insurance scheme (and any third-party beneficiaries), company credit card data, salary reviews;
- **Leave** - including documentation which may be provided in connection with any statutory leave, sick leave, holiday and family related leave records, garden leave, maternity leave, paternity leave and any other type of leave, such as unpaid leave and study leave;
- **Performance management** - performance assessments/meetings (including probationary assessments), colleague and manager feedback, appraisals, outputs from talent programs and formal and informal performance management processes;
- **Training and development** - such as data relating to training and development needs or training received;
- **Employee Surveys** – anonymised survey results held by HR following analysis of personal data and responses to survey;
- **Disciplinary** - such as any personal data contained in records of allegations, investigation and proceeding records and outcomes;
- **General correspondence/meetings** - relating to grievance and/or disciplinary processes, misconduct or performance issues, data arising in connection with litigation and complaints, involvement in incident reporting and disclosures;
- **Termination** - for example, dates and reason for leaving, termination agreements and payments, exit interviews and references;

- **Incapacity** - any accommodations or adjustments in connection with any incapacity;
- **Conflicts of Interest** - securities trading statements including information relating to family members and other accounts under Employees' control, details of any shares of common stock or directorships;
- Information about outside activities for Employees and family members;
- Information about gifts received/given for the Employee and family members; and
- Information about potential conflicts with Your family members that impact on Your role or with SMART DYNAMICS Group in general.

Special Categories of Personal Data:

- **Physical or mental health data** - such as information about Your physical or mental health or condition; for example, we record Your days of sickness, or workplace adjustments due to health reasons.
- **Other special categories of personal data** - such as information about racial or ethnic origin; religious or similar beliefs; membership of a trade union; the commission or alleged commission of any offence; and any proceedings for any offence committed or alleged to have been committed, the disposal of those proceedings or the sentence of any court in those proceedings.

Purpose and Basis for processing

We will hold, process and may disclose personal data provided by You for the following purposes (including but not limited to):

Purpose for processing	Basis for processing
<ul style="list-style-type: none"> • Recruitment/appointment including assessing Your job application; • Providing You with building and IT access; • Payroll and finance including paying salary, reimbursing expenses and other payments; • Keeping attendance and working time records; • Performance appraisals and management of performance; • Certain benefit payments and administration; and 	<ul style="list-style-type: none"> • This processing of Your data is necessary to process job applications submitted by, or on Your behalf, and for performance of Your contract of employment (or engagement).

Purpose for processing	Basis for processing
<ul style="list-style-type: none"> Administering employment termination. 	
<ul style="list-style-type: none"> Monitoring and promotion of equal opportunities, including the review of gender breakdown and progression; Monitoring use of IT and communications in accordance with our IT, email and internet policy; Provision of references; Investigating and responding to complaints from personnel, clients, business partners, regulators; and Maintaining emergency contact details. 	<ul style="list-style-type: none"> This processing of Your data is necessary for our legitimate business interest in managing our business including legal, personnel, administrative and management purposes and for the prevention and detection of crime, provided our interest is not overridden by Your interest. Please note that You have a right to object to processing of Your personal data where that processing is carried on for our legitimate interest.
<ul style="list-style-type: none"> Managing health and safety at work and incident reporting; Compliance with our regulatory (for example disclosing tax data to the office of the revenue commissioners) and professional requirements; and Exercising our right to defend, respond or conduct legal proceedings. 	<ul style="list-style-type: none"> This processing of Your data is necessary in order for us to comply with any legal or regulatory obligations.

Special Categories of Personal Data

Certain categories of Your personal data are regarded as 'special' including information relating to an individual's:

- Physical or mental health;
- Religious, philosophical or political beliefs;
- Trade union membership;
- Ethnic or racial origin;
- Biometric or genetic data; and
- Sexual orientation.

Special categories of personal data will only be collected and used in the following cases:

- (1) processing is necessary for the purposes of carrying out the obligations in the field of employment and social security and social protection law in so far as it is authorised by European Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;
- (2) processing is necessary for the assessment of Your working capacity;
- (3) the data subject has given explicit consent to the processing of special categories of personal data for one or more specified purposes.

We will only process data relating to Your criminal convictions or involvement in criminal proceedings when permitted by law, or where provided voluntarily by You.

Consent

In principle, we do not rely on Your consent for data use, except as required by the law. We may, however, from time to time, (i) ask for Your consent to use Your personal data for a specific purpose; and/or (ii) process Your personal data in order to protect Your vital interests or the interests of another (e.g. in cases of medical emergency, where disclosure of medical data may be necessary to protect Your/another's vital interests). If we do so, we will provide You with full details of the data that we would like to process and the reason we need it. We will also inform You about the fact that You can revoke Your consent at any time and how You should do that. You should be aware that withholding Your consent will never have an impact on Your employment or engagement with us or otherwise negatively affect You.

For the processing of physical data and special categories of personal data, including sensitive information, explicit consent from You serves as the legal basis.

Background Checks and KYC

As part of our recruitment and onboarding process, SMARTDYNAMICS Group may conduct background checks and Know Your Customer (KYC) verification to ensure compliance with legal and regulatory requirements.

- Purpose of Processing

We process certain personal data, including sensitive data, to:

- a) Verify the identity of candidates in accordance with internal compliance policies.
- b) Conduct fraud prevention and anti-money laundering (AML) checks.
- c) Ensure compliance with applicable laws and regulations, including sanctions screening and politically exposed persons (PEP) lists.
- d) Assess candidates' suitability for certain roles based on legal and business requirements.

- Categories of Personal Data Processed

During background checks and KYC verification, we may process:

- a) **General personal data:** Full name, date of birth, nationality, identification document details, contact information.
- b) **Identity verification data:** Passport or ID scans, document numbers, issuing country, expiration dates.
- c) **Biometric data:** Facial scans used for liveness detection and identity verification.
- d) **Publicly available data:** Information from PEP lists, sanctions databases, adverse media sources.
- e) **Technical and metadata:** IP addresses, device information, geolocation data.

- **Legal Basis for Processing**

We process this data based on:

- a) **Legitimate interests** (Article 6(1)(f) GDPR) – to ensure security, prevent fraud, and comply with regulatory obligations.
- b) **Legal obligations** (Article 6(1)(c) GDPR) – where required under applicable AML, financial, or employment regulations.
- c) **Explicit consent** (Article 9(2)(a) GDPR) – for processing sensitive personal data, including biometric verification. Candidates have the right to withdraw consent at any time, but this may impact the ability to proceed with employment.

- **Data Sharing and Transfers**

Background checks and KYC verification are conducted with the assistance of third-party service providers. These providers are data processors under GDPR and adhere to strict data protection and security standards.

Where data is transferred outside the EEA, we implement appropriate safeguards, such as Standard Contractual Clauses (SCCs), to ensure compliance with GDPR requirements.

- **Retention of Data**

We retain KYC and background check data only as long as necessary for the purposes outlined above. Typically, this data is stored for up to 1 year for unsuccessful candidates and in accordance with company retention policies for hired employees. After this period, data is securely deleted unless legal obligations require longer retention.

- **Candidate Rights**

Candidates have the right to:

- a) **Access** their personal data processed for KYC purposes.
- b) **Request rectification** if the data is inaccurate.
- c) **Object** to processing based on legitimate interests.
- d) **Withdraw consent** for biometric data processing.
- e) **Request deletion** of their personal data, subject to legal limitations.

For any questions or to exercise your rights, please contact legal@smartdynamics.pro. Further details on KYC processing can be found in our [PRIVACY NOTICE](#).

Where You do not provide us with Your Personal Data

If You do not provide us with Your personal data, we may not be able to process Your job application, suitability for a particular role, Your pay or other benefits, comply with our legal obligations or manage our business. Upon request, we will tell You when we ask for information which is needed for the purposes of complying with contractual or legal obligations.

Security and Storage of Personal Data

The security of Your personal data is important to us. We follow generally accepted standards to protect Your personal data. Access to personal data (including special categories of personal data) in both electronic and paper form is restricted to members of HR. In certain circumstances, the Legal Department, and/or Employees, and/or Workers who have a legitimate and justifiable reason to view such data may also need to access this personal data.

Recipients of Your Personal Data

We may disclose Your personal data to SMARTDYNAMICS Group, without limitation, for the following reasons: in order to run global processes, carry out group wide reporting, or take decisions about hiring, promotion, or remuneration. We may also disclose personal data as part of a corporate transaction, such as a merger or sale of assets.

It may be necessary from time to time for us to disclose Personal Data to third parties or agents, including without limitation to the following:

- Third parties to assist in the administration, processing and management of certain activities pertaining to past and current Employees and/or Workers, and/or Candidates;
- Individuals or companies employed by SMARTDYNAMICS Group to carry out specific services, functions or consultancy work including external reference agencies and other financial institutions;
- Your relatives or legal representatives;
- Regulatory bodies to whom we are obliged or required to disclose information including Ministry of Labour, Tax Authorities, Courts and Court-appointed persons;
- Insurance or assurance companies and health insurance providers or trade unions;
- Legal and medical practitioners;
- Pension providers;
- Potential purchasers or bidders;
- Relevant Government departments and agencies; and
- Other support service providers necessary to assist SMARTDYNAMICS Group with the above.

The list of third parties to which SMARTDYNAMICS Group may disclose Your personal data is provided under the link in the Annex 1 to this Notice under this [link](#). If for some reason the link does not open, please contact us by email at legal@smartdynamics.pro. We will process Your request and use commercially reasonable efforts to respond promptly.

We will inform You in advance if we intend to further process or disclose Your personal data for a purpose other than the purposes set out above. We take all reasonable steps, as required by law, to ensure the safety, privacy and integrity of such data and information and, where appropriate, enter into contracts with such third parties to protect the privacy and integrity of such data and any information supplied.

Transfer of Personal Data outside the EEA

The personal data we maintain will primarily be stored and processed within the EU. We will do our best to keep this personal data secure. All information we hold is stored on our secure servers (which we own or license from appropriate third parties). We use industry-standard procedures and security standards to prevent unauthorized access to our servers.

However, there may arise situations where the personal data that we collect from You may be transferred to, and stored at, a destination outside the European Economic Area (**EEA**), for the purposes described above. Due to the global nature of our business, Your personal data may be disclosed to companies outside the EEA. It may also be processed by personnel operating outside the EEA who work for us or for one of our suppliers who act on our behalf. We will ensure suitable safeguards are in place to protect the privacy and integrity of Your personal data in such circumstances.

We have entered into Standard Contractual Clauses with all non-EEA third parties whose data processing tools we use (data processors) if there is no adequacy decision by the EU Commission for their particular country.

We adhere to the principles of minimization and anonymization, where feasible, to ensure compliance with the GDPR and other relevant data privacy laws when transferring personal data, if necessary. By providing Your personal data, You explicitly consent to its transfer, storage, or processing outside the EU. We will take all reasonable steps to ensure that this personal data is handled securely and in accordance with this Notice.

Security

Ensuring the security of Your data is a top priority for us. We employ robust technical and organizational measures to safeguard the personal information entrusted to us.

We have instituted reasonable administrative, technical, and physical security measures to protect Your personal data from unauthorized access, alteration, or destruction. For instance:

- We utilize SSL encryption (HTTPS) for all interactions involving personal data.
- Our databases are encrypted, and we store data on physically secure servers protected by firewalls.

In the event of a personal data breach as defined in Article 4.12 of the GDPR, we will promptly notify You. This notification will include relevant details, measures taken, and an assessment of associated risks, as required by applicable law and our Notice. We are committed to addressing breaches promptly and transparently, taking necessary actions and appropriate measures to mitigate the breach.

To report a personal data breach or seek assistance, please contact us at legal@smartdynamics.pro. We will address Your concerns accordingly.

Data Retention

We store Personal Data for as long as necessary to fulfill the purpose for which it was collected, unless a longer retention period is required by law or for legitimate legal interests, such as the exercise or defense of legal claims.

Typically, Employee Personal Data is retained for the duration of employment or and for a period of up to **2 years** after the end of the employment contract. This period allows us to comply with legal obligations and address any post-employment matters or potential claims.

Worker's Personal Data is retained for the duration of the agreement between us and Worker and for a period of up to **2 years** after the termination or expiration of the agreement. This period allows us to comply with legal obligations and address any matters related to the agreement or potential claims.

For Candidates, Personal Data is retained for up to **1 year** after the conclusion of the recruitment process, unless extended for legitimate interests (e.g., potential future hiring needs).

Specific statutory retention periods may apply, such as those outlined in the Social Insurance Contributions and Social Insurance Law (Law 59(I)/2010), the Assessment and Collection of Taxes Law (Law 4/1978), the Limitation Act 66(I)/2012, and other applicable laws.

Additionally, personal data related to non-disclosure or non-use agreements may be retained as necessary to protect the company's rights and interests, aligned with applicable limitation periods under relevant laws.

Your Data Rights

You have several rights in relation to Your personal data. You have a right to:

- access a copy of Your personal data held by SMARTDYNAMICS Group;
- request rectification of Your personal data if it is inaccurate or incomplete;
- request erasure of Your personal data in certain circumstances;
- restrict or limit our use of Your personal data in certain circumstances;
- move (or port) personal data which is automated in certain circumstances;
- object to the processing of Your data where our legal basis for processing Your data is our legitimate interests;
- withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal;
- right to File Complaint.

1.1 Subject Access Requests

You may make a written request for information we hold about You.

We will provide a copy of the personal data to which You are entitled (i) free of charge, but may charge a reasonable fee, based on administrative costs, for any further copies You request and (ii) without undue delay, and at the latest within one month of receipt of Your request. This period may be extended by two further months where requests are numerous or complex. We will provide You with information on action taken in response to the exercise of any of these rights.

Where You make the request by electronic means, and unless otherwise requested by You, the information will be provided in a commonly used electronic form.

1.2 Rectification requests

If You have requested the rectification of Your personal data, we will inform certain recipients to whom that personal data have been disclosed, unless this proves impossible or involves disproportionate effort. We will also inform You about the recipients to whom the personal data has been disclosed, if You request it.

1.3 Objections to or requests for erasure or restriction of processing

If You have requested the erasure or restriction of Your personal data, we must inform certain recipients to whom that personal data have been disclosed, unless this proves impossible or involves disproportionate effort. We must also inform You about the recipients to whom the personal data has been disclosed, if You request it. The following methods may be used to restrict processing the personal data: (i) temporarily moving the selected Personal Data to another Processing system, (ii) making the selected Personal Data unavailable to other users, or (iii) temporarily removing the published personal data from a website (if applicable).

If You have exercised Your right to restrict processing of Your Personal Data, we are permitted to store it but not further process it. We can only continue to process the personal data in case if:

<input type="checkbox"/> we obtained Your consent;
<input type="checkbox"/> The processing is necessary for the exercise or defence of legal claims;
<input type="checkbox"/> The processing is necessary for the protection of the rights of other individuals or legal persons; or
<input type="checkbox"/> The processing is necessary for public interest reasons.

We will notify You before lifting the restriction. For the avoidance of doubt, if there are substantial and justified legal grounds that Your personal data should not be rectified or erased, we reserve the right to decline to rectify or erase it, in which case, we will notify You.

1.4 Requests for Data portability

Where You have requested to port Your personal data that You have provided to us, we will provide it in a structured, commonly used and machine readable (i.e. electronic) format, and have the personal data transmitted to another data controller without hindrance. This right does not extend to data generated by us and only applies where the processing is based on consent or necessary for the performance of a contract to which You are a party and has been carried out by automated means.

1.5 Objections to processing

You may object to our processing Your personal data for one of the following purposes:

- a) public interest or legitimate interest grounds;
- b) direct marketing (if applicable); or
- c) scientific, historical research or statistical purposes (unless the processing is necessary for the performance of a public interest task).

In such circumstances we must stop processing the Personal Data, unless we can demonstrate (i) compelling legitimate grounds for the processing which override Your rights; or (ii) the processing is necessary for the defence of legal claims.

There are no grounds to refuse to comply with Your objection to processing for direct marketing purposes. The right to object must be explicitly brought to Your attention, at the time of first communication with You and at the time of each communication, if applicable, and must be presented clearly and separately from other information.

1.6. Right to File Complaint

You have the right to lodge a complaint about our practices with respect to Your personal data with the supervisory authority of Your country.

To exercise Your rights, please contact us via legal@smartdynamics.pro.

If You submit a request, we typically aim to fulfill it within one month. If additional time is needed to assist You in exercising Your rights, we will inform You accordingly. We reserve the right to reject manifestly unfounded or excessive requests. During the process of exercising Your data protection rights, we may ask You to confirm Your identity. This verification step ensures that You are entitled to access certain information and that the rights of third parties are not infringed upon. If we are unable to verify Your request, we will be unable to fulfill it.

Changes to this People Data Privacy Policy

We reserve the right to amend this People Data Privacy Policy from time to time to reflect changes in the law, our data collection and data use practices. Please check this page periodically for changes and refer to the “last updated” date at the top of the page to know if it has been revised since Your last visit. If we make any changes to this People Data Privacy Policy that we consider to be material to Your consent, we will notify You of them.

Further Information

If You require any further clarification regarding this Notice, please contact: legal@smartdynamics.pro.

For Your convenience we provide the link to the full text of the [General Data Protection Regulation](#).