

**PANCYPRIAN FOOTBALLERS  
ASSOCIATION  
(PASP)**



**PRIVACY POLICY**



Last update  
February 26, 2024

### Introduction

The Pancyprian Footballers' Association (PASP) is committed to the protection of privacy and the personal data it processes. In the framework of the General Data Protection Regulation (GDPR) of the European Commission also known as GDPR (2016/679 EU), which entered into force on May 25, 2018, the legislative framework for the protection of data subjects regarding the processing of personal data is strengthened in the European Union.

Simultaneously, the "Protection of Natural Persons Against the Processing of Personal Data and the Free Circulation of this Data" Law (125(I)/2018) is in force and is being applied in adaptation and harmonization with the GDPR. The Pancyprian Footballers' Association (PASP), in the context of its activities and mission, complies with the GDPR and takes the appropriate technical and organizational measures as provided in the regulation and the legislation in general.

At PASP, we are committed to protecting the privacy of the information and personal data you entrust to us. We are also committed to managing your personal information in a fair and transparent manner. The following privacy policy applies to the personal data processed by PASP, which is a registered association in Cyprus with registration number 645, and with address, 48 Themistokle Dervi, 1066 Nicosia. PASP was created for the purpose of uniting and organizing football players in the face of possible issues or problems that may arise from time to time.

This privacy policy describes what personal data or information we collect from you, when and why we use this information and to whom we share it. In addition, it indicates your rights in relation to your information, as well as who to contact for additional information or any questions you may have.

You can read more about this privacy policy by following the paragraphs below:

1. What type of personal data do we retain about you?
2. What personal data is collected and how?
3. How do we use the personal information we retain?
4. The legal grounds we use for processing your personal information.
5. To whom we disclose your information.
6. Protection of your personal information.
7. How long do we keep your data?
8. Your rights.
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## 1. What type of personal data do we retain about you?

Depending on the purpose for which it processes it, PASP collects different types of personal data, which we obtain legally, not only from you but also from other sources that are freely accessible to the public, such as for example social media (LinkedIn and others), and we are allowed to process them. The categories of personal data we collect are:

- ✓ Identification data (name, surname, identity card number, passport number, telephone number etc.)
- ✓ Demographic data (address, place of residence)
- ✓ Medical data
- ✓ Professional information
- ✓ Education data

The personal data we collect is limited and necessary for the purpose of Processing. Processing of any data is conducted under specific legal basis.

When mentioning “our Website” at any point within this Policy, we refer the following website <https://pasp.org.cy/>.

## 2. What personal data is collected and how?

The personal data we collect may include without limitation: your name, date of birth, social security number, your parent’s name, your mother’s name, your email address, your contact numbers, your passport number, your email IP address, the type and language of your browser and other similar information.

The abovementioned personal data is collected:

- ✓ With your registration with PASP
- ✓ By entering into agreements with PASP as advisor or as a supplier
- ✓ With your participation in PASP’s activities and events
- ✓ With participation in PASP voting
- ✓ With your participation in University scholarship programs
- ✓ With your acceptance to appear in PASP’s publications and Social Media pages that PASP manages
- ✓ From the CCTV video surveillance located in our offices
- ✓ By submitting applications and CVs for employment in the company.

We also collect personal data about you when you use our website. We use cookies which are very small files that are loaded onto your computer every time you visit our website. These files may collect personal data and are intended to improve the way our website works.

More information on how to use cookies and other tracking technologies, and how you can control them can be found in the Cookies Policy posted on our website.



We collect information about you that falls under the 'special categories' of personal data (sensitive personal data), such as details about your nationality. Please note that the processing of sensitive personal data is prohibited by law, and your express consent is required whenever we may need to collect this type of data.

We understand the importance of protecting children's privacy. The collection of personal data of children under the age of fourteen takes place after the consent of a parent or guardians.

### 3. How do we use the personal information we retain?

We will process your personal data only if it is allowed by the legislation. We usually use your personal information in the following cases:

- ✓ **For your registration as a member of PASP**
- ✓ **For your participation in educational programs and events organized in Cyprus and abroad**
- ✓ **For your participation in scholarship programs**
- ✓ **To comply with legal obligations.**
- ✓ **In case you have given us your consent.**
- ✓ **To sign contracts with you.**
- ✓ **To evaluate your CV.**
- ✓ **To process your requests.**
- ✓ **To contact you.**

You may withdraw your consent to any such processing at any time by contacting us at [info@pasp.org.cy](mailto:info@pasp.org.cy) or by using the "Unsubscribe" function, which is available in any communication for information purposes, including emails, which we will send you from time to time.

Please note that any processing of personal data prior to the withdrawal of your consent is not affected.

#### **Special categories of data (sensitive data)**

The processing of special categories of personal data (sensitive data) is prohibited by the General Data Protection Regulation. However, if we process sensitive data we will do so because:

- you have given your explicit consent to the processing of your information,
- processing is necessary to comply with our obligations under employment, social security, or social protection legislation,
- the processing is necessary for the establishment, exercise, or support of legal claims, or
- you have made your data publicly available.



### **Use of personal data collected through our website**

In addition to the above purposes regarding the operation of PASP, we may also process your personal data collected to manage and respond to any request you make through our website:

### **4. The legal grounds we use for processing your personal information.**

The legal bases on which we base the processing of personal data are:

- ✓ When you have consented to the processing of your data, for one or more purposes
- ✓ When processing is necessary to execute a contract to which you are a party
- ✓ When processing is necessary for our compliance with our legal obligations
- ✓ When processing is necessary to protect the vital interests of the data subject or of another natural person
- ✓ When processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- ✓ When processing is necessary for the purposes of the legitimate interests pursued by the company, except where such interests are overridden by the interests or fundamental rights and freedoms of you, the data subject.

### **5. To whom we disclose your information.**

In addition to the purposes described in this Privacy Policy, we may share your personal data with third parties:

- To external partners (accountants, auditors etc.) whose purpose is to control PASP procedures.
- To suppliers and consultants who aim to improve the services provided by PASP.
- To other third parties whose purpose is the organization, the achievement of the purpose and the smooth operation of PASP.

As part of the tasks assigned to them by PASP as the “controller” and in accordance with the GDPR, either under a contract or other legal act, the employees, and the associates of PASP have access to your personal data, as “Processors”.

Further information regarding the above disclosures and the adequate guarantees used by the association for these disclosures (including copies of relevant agreements) can be obtained by contacting the Data Protection Officer of PASP at 22-466508 or by e-mail at [info@pasp.org.cy](mailto:info@pasp.org.cy).



## 6. Protection of your personal information

We have implemented several technical and organizational measures to ensure that your personal data is secure, accurate and up to date. These measures include:

- ❖ Training of our staff to ensure that we are always aware of our obligations regarding the protection of privacy and the protection of personal data in their management.
- ❖ Administrative and technical checks and controls restrict access to personal data based on the "need for knowledge".
- ❖ Technical checks and controls including protection programs, encryption, and anti-virus software.
- ❖ Physical security measures, such as special staff access to our facilities.

## 7. How long do we keep your data?

PASP retains your personal data for the following periods:

- For as long as necessary for the purposes for which we collected your personal data
- For any retention period required by law
- Until the end of the period in which legal proceeding or investigations may arise regarding the purpose for which we collected your personal data
- For as long as required, which covers the period you are entitled to take legal action against the PASP.

Finally, we will retain your personal data in accordance with the Retention and Destruction Policy which can be made available to you upon request.

## 8. Your Rights

Under the General Data Protection Regulation, you have rights regarding the processing of your personal data. More specifically:

- ✓ **Right to Information (article 12):** You have the right to concise, transparent, comprehensible, and easily accessible information without delay and in any case a response within one month of receipt of the request.
- ✓ **Right to information when obtaining consent (articles 13 and 14):** When obtaining consent, PASP will inform you about the purposes of collecting your personal data, its retention period, to whom the data will be disclosed and information regarding their processing.



- ✓ **Right of Access (article 15):** You have the right to be fully informed about your personal data being processed by PASP. You can request a copy of your personal data and we are obliged within a specific period to deliver it to you.
- ✓ **Right to rectification (article 16):** You have the right to request correction or modification or completion of your personal data that we keep and process either because it is incomplete or because it is incorrect.
- ✓ **Right to erasure (article 17):** You have the right to request from PASP the deletion of personal data concerning you immediately and without delay. Your rights will be satisfied unless PASP as Data Controller has an overriding legitimate interest.
- ✓ **Right to restriction of processing (article 18):** You have the right to request that we suspend the processing of your personal data when one of the following applies:
  - your personal data are not accurate,
  - have been used illegally but you do not want us to delete them,
  - are no longer relevant, but you want to keep them to use them for possible legal claims, or
  - You have already asked us to stop processing your personal data, but you wait for us to confirm if we have another legal basis to continue processing them.
- ✓ **Notification Right (article 19):** You have the right to be informed by PASP, about the notification of third parties to which your personal data was disclosed, in the case of their correction and/or deletion.
- ✓ **Right to data portability (article 20):** You have the right to receive your personal data in a structured, commonly used format and transmit it to another organization (provided that this is technically possible).
- ✓ **Right to object (article 21):** You have the right to object to the processing of the data concerning you unless we as PASP have an overriding legal basis in continuing the processing.
- ✓ **Right to Non-Automated Decision Making (article 22):** You have the right not to be subject to decisions made solely because of automated processing including profiling.

At any time, you have the right to file a complaint against PASP to the Data Protection Commissioner. You also have the right to withdraw your consent to the processing of your personal data for specified purposes at any time. Any withdrawal of consent will not affect the lawfulness of processing that was based on your consent before it was withdrawn by you.

Some of the data subject's rights may not be exercised if there are reasons as stated in Article 23 of the GDPR.

You will not have to pay any fee to access your personal data (or to exercise any of your rights). However, we may charge a reasonable fee if your request for access is



manifestly unfounded or excessive. Otherwise, we may refuse to fulfill your request in such circumstances.

When submitting your request, and to help us verify your identity to ensure your right to access (as well as your other rights), we may ask you for certain information as an appropriate security measure to ensure that your personal data will not be shared with a person who does not have the right to receive it.

To exercise any of your rights or if you have any other questions regarding the processing of your personal data by us, you may contact the DPO at [info@pasp.org.cy](mailto:info@pasp.org.cy) or write to us at:

Data Protection Officer  
Pancyprian Footballers Association,  
48, Themistocli Dervi street, office 202,  
1066 Nicosia,  
Cyprus

You may also use the above contact details to file a complaint regarding the processing and the protection of your personal data.

### **9. Right to complain**

If you are not satisfied with the way we handled your personal data or any of your questions or requests, you have the right to file a complaint with the Office of the Personal Data Protection Commissioner in Cyprus. If you would like to contact the Commissioner's office, please contact us for assistance.

### **10. Changes to this privacy policy**

We may modify this privacy policy from time to time. To let you know when we make changes to this privacy statement, we will amend the revision date at the top of the first page. The new modified privacy policy will apply, starting from the revision date. Therefore, we encourage you to periodically review this policy to be informed about how we are protecting your information.