Prosterium

Version 1.

Privacy Policy - Prosterium Limited

1. Who we are

Prosterium Limited provides software development, IT consultancy, web hosting, infrastructure management and digital marketing services.

We act as a data controller when we process personal data to operate prosterium.com, respond to enquiries and manage our own business relationships. Section 2 explains how we handle personal data when providing services on behalf of clients.

For privacy questions or requests, email info@prosterium.com or write to Prosterium Limited, 2 Pergamou Street, Nicosia 2413, Cyprus.

2. Data we handle when providing services to clients

When we host a website or application, develop or maintain software, manage IT infrastructure or support a client's digital marketing activities, we may need to store or access personal data to carry out the agreed work. Depending on the service, this may include information held in hosted systems and backups, user or account identifiers, technical logs, support records or campaign data.

When we process personal data on behalf of a controller, we act as a processor. When another processor engages us to carry out part of that work, we act as a sub-processor. In either case, we handle the data in accordance with documented instructions and the applicable data processing terms. We limit access to authorised people who need it for the work and are subject to confidentiality obligations.

If your data is held in a client's website, application or system, please refer to the relevant controller's privacy notice and direct any data protection request to that controller. We assist with requests relating to data we process on its behalf.

3. Information we collect for our own purposes

- **Enquiries.** If you contact us by email or telephone, we collect the details you provide, such as your name, contact details, organisation and the content of your enquiry. We need a way to reach you to respond.

- **Business relationships.** We may collect your name, role, work contact details and information about your involvement in a proposal, project or contract. We may receive this information from you or from the organisation you represent.
- **Website visits.** We may process technical information such as your IP address, browser and device information, the pages or resources requested, and the timing and performance of those requests.

4. Why we use your information

Purpose	Legal basis under the GDPR
Responding to enquiries, preparing proposals and managing relationships with clients, suppliers and business contacts.	Our legitimate interests in handling correspondence and managing our business relationships under Article 6(1)(f).
Taking steps you request before entering into a contract with you personally, or performing a contract to which you are a party.	Contractual necessity under Article 6(1)(b).
Delivering and securing the website, measuring its performance and diagnosing technical issues.	Our legitimate interests in providing a secure and reliable website under Article 6(1)(f), where applicable.
Using optional website technologies where consent is required.	Your consent under Article 6(1)(a).
Meeting statutory recordkeeping requirements or responding to legally binding requests.	Compliance with a legal obligation under Article 6(1)(c).
Handling disputes and establishing, exercising or defending legal claims.	Our legitimate interests in protecting our legal rights under Article 6(1)(f).

5. Who receives your information

For our website and business operations, we may share relevant information with providers of hosting, cloud infrastructure, website content delivery, performance monitoring, communications and IT support. We may also share information with professional advisers when needed for advice or to handle a dispute, and with courts or competent authorities where required by law.

Where we engage a sub-processor for work performed on a client's behalf, we do so in accordance with the applicable authorisation and data protection terms.

6. Website technologies

Some website resources, such as fonts and scripts, are delivered by external services. When your browser requests them, those services receive connection information such as your IP address. We also use a tool to measure how quickly pages load and respond so we can identify performance issues.

Where cookies or similar technologies require consent, we ask for it before use. You can change or withdraw your consent through the same website controls used to give it.

7. International transfers

Some service providers may process or access personal data outside the European Economic Area. Where a transfer is covered by a European Commission adequacy decision, we rely on that decision. Where contractual safeguards are required, we use the European Commission's Standard Contractual Clauses and any additional measures required. You can contact us for details of the safeguards that apply or to request a copy.

Transfers of data we process on behalf of clients follow the applicable documented instructions, data processing terms and legal requirements.

8. Retention and security

We keep enquiry information while we respond and for any active proposal or agreed follow-up. We retain business records for as long as needed to manage the relationship and meet applicable recordkeeping or legal requirements. We retain technical records for the time needed to operate and secure the website or investigate an issue.

We use technical and organisational safeguards appropriate to the risks. For data we process on behalf of clients, retention, return and deletion follow the applicable instructions, agreement and legal requirements.

9. Your rights

Depending on the circumstances, you can ask us to access, correct or erase your personal data, restrict its use or receive it in a portable format. You can **object to processing based on our legitimate interests** for reasons relating to your particular situation. Where we rely on consent, you can withdraw it at any time, with effect from that point.

For data we control, email **info@prosterium.com** to exercise your rights. We respond within one month of receiving your request and will let you know within that period if an extension is permitted and needed.

You may also complain to the data protection authority where you live or work, or where you believe an infringement occurred. In Cyprus, you can contact the Office of the Commissioner for Personal Data Protection at **commissioner@dataprotection.gov.cy**. How to lodge a complaint.

10. Updates to this policy

We publish updates on this page and revise the version at the top when the policy changes.