### **PRIVACY POLICY**

LITTLE SCIENTISTS WORKSHOPS LTD (HE 458570) (hereinafter "We/Us/Our") understands that Your privacy is important to You (the parent(s) of the child, and the child(s), the names of which appear on the registration form submitted at the time of Your registration with Us) (hereinafter "You/Your") and that You care about how Your personal data is used. We respect and value the privacy of all of Our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with Our obligations and Your rights under the law.

### 1. Information About Us

- 1.1. **LITTLE SCIENTISTS WORKSHOPS LTD**, is a private limited liability company by shares, incorporated and existing under the laws of the Republic of Cyprus, registered with the Registrar of Companies of the Republic of Cyprus under number HE 458570, having its registered office at lakovou Katsounotou 6, Nea Ekali, P.C. 3112 Limassol, Cyprus.
- 1.2. We are the legal and beneficial owner of the domain name of Our Website and We are the sole operator of Our website: <a href="https://littlescientists.com.cy/">https://littlescientists.com.cy/</a> (hereinafter "Our Website").
- 1.3. Our email address is: info@littlescientists.com.cy .
- 1.4. Our telephone number is: 0035795155555.
- 1.5. Our postal address is: lakovou Katsounotou 6, Nea Ekali, P.C. 3112 Limassol, Cyprus.

# 2. What Does This Policy Cover?

2.1 This Privacy Policy explains how We use Your personal data: how it is collected, how it is held, and how it is processed. It also explains Your rights under the law relating to Your personal data.

### 3. What Is Personal Data?

- 3.1 Personal data is defined by the Regulation (EE) 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, and repealing Directive 95/46/EC (GDPR), which applies as of 25 May 2018 (hereinafter the "GDPR") and Law 125(I)/2018 of the Republic of Cyprus and any successor legislation or regulation (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.
- 3.2 Personal data is, in simpler terms, any information about You that enables You to be identified. Personal data covers obvious information such as Your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.
- 3.3 The personal data that We use is set out in Article 5, below.

# 4. What Are My Rights?

- 4.1. Under the Data Protection Legislation, You have the following rights, which We will always work to uphold:
  - a) The right to be informed about Our collection and use of Your personal data. This Privacy Policy should tell You everything You need to know, but You can always contact Us to find out more or to ask any questions using the details in Article 11 below.
  - b) The right to access the personal data We hold about You. Article 10 will tell You how to do this.
  - c) The right to have Your personal data rectified if any of Your personal data held by Us is inaccurate or incomplete. Please contact Us using the details in Article 11 to find out more.
  - d) The right to be forgotten, i.e. the right to ask Us to delete or otherwise dispose of any of Your personal data that We hold. Please contact Us using the details in Article 11 to find out more.
  - e) The right to restrict (i.e. prevent) the processing of Your personal data.
  - f) The right to object to Us using Your personal data for a particular purpose or purposes.
  - g) The right to withdraw consent. This means that, if We relying on Your consent as the legal basis for using Your personal data, You are free to withdraw that consent at any time.
  - h) The right to data portability. This means that, if You have provided personal data to Us directly, We are using it with Your consent or for the performance of a contract, and that data is processed using automated means, You can ask Us for a copy of that personal data to re-use with another service or business in many cases.
  - i) Rights relating to automated decision-making and profiling. We do not use Your personal data in this way.
- 4.2. For more information about Our use of Your personal data or exercising Your rights as outlined above, please contact Us using the details provided in Article 11.
- 4.3. It is important that Your personal data is kept accurate and up-to-date. If any of the personal data We hold about You changes, please keep Us informed as long as We have that data.
- 4.4. Further information about Your rights can also be obtained from the Commissioner for Personal Data Protection of the Republic of Cyprus.
- 4.5. If You have any cause for complaint about Our use of Your personal data, You have the right to lodge a complaint with the Commissioner for Personal Data Protection of the Republic of Cyprus. We would welcome the opportunity to resolve Your concerns ourselves, however, so please contact Us first, using the details in Article 11.

### 5. What Personal Data Do You Collect and How?

5.1. We may collect and hold some or all of the personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data and any personal data relating to children is only obtained

with the prior written consent of their parents or guardians.

Data Collected	How We Collect the Data
Child's full name.	On registration.
Child's date of birth.	On registration.
Name of parent(s) / guardian(s).	On registration.
Contact number.	On registration.
Parent's email address.	On registration.
Photographs and/or videos of children.	During the provision of Our services to You. The specific and clear permission of the parent(s) / guardian(s) at the time of registration is required and obtained.
Child's health problems or allergies.	On registration or at a later stage.
Your child's preferences.	On registration.

# 6. How Do You Use My Personal Data?

6.1. Under the Data Protection Legislation, We must always have a lawful basis for using personal data. The following table describes how We use Your personal data, and Our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Administration and operation of Our business.	Child's full name / Child's date of birth / Name of parent(s) / guardian(s) / Contact number / Parent's email address / Child's health problems or allergies / Your child's preferences.	The collection and use of Your personal data is necessary for the provision of Our services & You have given Your clear permission and consent to Us to collect and use Your personal data.
Supplying Our services to You.	Child's full name / Child's date of birth / Name of parent(s) / guardian(s) / Contact number / Parent's email address / Child's health problems or allergies / Your child's preferences.	The collection and use of Your personal data is necessary for the provision of Our services & You have given Your clear permission and consent to Us to collect and use Your personal data.
Personalising and tailoring Our services for You.	Child's health problems or allergies / Your child's preferences.	The collection and use of Your personal data is necessary for the provision of Our services & You have given Your clear permission and consent to Us to collect and use Your personal

		data.
Communicating with You.	Name of parent(s) / guardian(s) / Contact number / Parent's email address.	The collection and use of Your personal data is necessary for the provision of Our services & You have given Your clear permission and consent to Us to collect and use Your personal data.
Direct or other marketing.	Photographs and/or videos of children / Parent's email address.	You have given Your clear permission and consent to Us to collect and use Your personal data.

- 6.2. With Your permission, We may also use Your personal data for direct or other marketing purposes, which may include, inter alia, contacting You by email and/or telephone and/or text message and/or post with information, news, and offers on Our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect Your rights and comply with Our obligations under the Data Protection Legislation, and You will always have the opportunity to opt-out. We will always obtain Your express opt-in consent before sharing Your personal data with third parties for marketing purposes and You will be able to opt-out at any time.
- 6.3. We will only use Your personal data for the purpose(s) for which it was originally collected unless We reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use Your personal data for that purpose. If We do use Your personal data in this way and You wish Us to explain how the new purpose is compatible with the original, please contact Us using the details in Article 11.
- 6.4. If We need to use Your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, We will inform You and explain the legal basis which allows Us to do so.
- 6.5. In some circumstances, where permitted or required by law, We may process Your personal data without Your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and Your legal rights.

# 7. How Long Will You Keep My Personal Data?

7.1. We will not keep Your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Child's full name.	For the period of provision of Our services to You.
Child's date of birth.	For the period of provision of Our services to You.
Name of parent(s) / guardian(s).	For the period of provision of Our services to You.

Contact number.	For the period of provision of Our services to You.	
Parent's email address.	For the period of 5 (five) years from the date of Your Registration.	
Photographs and/or videos of children.	For the period of 1 (one) year from the moment we obtain Your respective consent and permission.	
Child's health problems or allergies.	For the period of provision of Our services to You.	
Your child's preferences.	For the period of provision of Our services to You.	

# 8. How and Where Do You Store or Transfer My Personal Data?

- 8.1. We will only store Your personal data in the Republic of Cyprus. This means that it will be fully protected under the Data Protection Legislation.
- 8.2. The security of Your personal data is essential to Us, and to protect Your data, We take a number of important measures, including the following:
  - limiting access to Your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality; and
  - procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Your personal data) including notifying You and/or the Commissioner for Personal Data Protection of the Republic of Cyprus where We are legally required to do so.

# 9. **Do You Share My Personal Data?**

- 9.1. We will not share any of Your personal data with any third parties for any purposes, subject to the following exception[s].
- 9.2. If We sell, transfer, or merge parts of Our business or assets, Your personal data may be transferred to a third party. Any new owner of Our business may continue to use Your personal data in the same way(s) that We have used it, as specified in this Privacy Policy.
- 9.3. In some limited circumstances, We may be legally required to share certain personal data, which might include Yours, if We are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.
- 9.4. We may share Your personal data with other companies in Our group (including our subsidiaries or holding company and its subsidiaries), or companies we license Our services, or rights thereunder, to under a franchise or other related agreement, for direct or other marketing purposes.
- 9.5. If any of Your personal data is shared with a third party, as described above, We will take steps to ensure that Your personal data is handled safely, securely, and in accordance with Your rights, Our obligations, and the third party's obligations under the Data Protection Legislation.
- 9.6. If We sell, transfer, or merge parts of Our business or assets, Your personal data may

be transferred to a third party. Any new owner of Our business may continue to use Your personal data in the same way(s) that We have used it, as specified in this Privacy Policy.

9.7. In some limited circumstances, We may be legally required to share certain personal data, which might include Yours, if We are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

### 10. How Can I Access My Personal Data?

- 10.1. If You want to know what personal data We have about You, You can ask Us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".
- 10.2. All subject access requests should be made in writing and sent to the email or postal addresses shown in Article 11. To make this as easy as possible for You, a Subject Access Request Form is available for You to use on Our Website. You do not have to use this form, but it is the easiest way to tell Us everything We need to know to respond to Your request as quickly as possible.
- 10.3. Normally, there is no fee payable for a subject access request. If Your request is 'manifestly unfounded or excessive' (for example, if You make repetitive requests) a fee may be charged to cover Our administrative costs in responding.
- 10.4. We will respond to Your subject access request within 1 (one) month of receiving it. Normally, We aim to provide a complete response, including a copy of Your personal data within that time. In some cases, however, particularly if Your request is more complex, more time may be required up to a maximum of 2 (two) months from the date We receive Your request. You will be kept fully informed of Our progress.

#### 11. How Do I Contact You?

11.1. To contact **U**s about anything to do with Your personal data and data protection, including to make a subject access request, please use the following details:

Email address: info@littlescientists.com.cy.

Telephone number: 0035795155555.

Postal Address: lakovou Katsounotou 6, Nea Ekali, P.C. 3112 Limassol, Cyprus.

## 12. Changes to this Privacy Policy

- 12.1. We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if We change Our business in a way that affects personal data protection.
- 12.2. If a change is material We will try to provide at least 30 (thirty) calendar days' written notice prior to any new terms taking effect. What constitutes a material change will be determined at Our sole discretion. During this time, if You do not agree with the notified changed, You may terminate Our contract with a written notice of immediate effect to be provided to Us within Our notice period.
- 12.3. By continuing to use our Service after those changes become effective, You agree to be bound by the revised terms.

This Policy was last updated on 18/08/2024.