

DOMIDO GROUP – PRIVACY POLICY

Last updated: 3 June 2021

Welcome to our Privacy Policy.

ESC EUROPEAN SMART CONSTRUCTION LTD (“**ESC**” or “**we**”) and/or its affiliates (collectively, “**DomiDo Group**”) provide site features and other products and services to you when you visit www.domido.com (“**our site**”), use DomiDo Group products or services, software, or mobile applications (“**DomiDo Group Services**”).

We respect your privacy and are committed to protecting your personal data. This Privacy Policy aims to inform you on how we look after your personal data when you visit our site and tell you about your privacy rights and how the law protects you.

Please read this legal document carefully. You should also read our Terms of Use which set the rules for using our site.

WHO WE ARE AND HOW TO CONTACT US

DomiDo Group is made up of different legal entities. This Privacy Policy is issued on behalf of the DomiDo Group. ESC is the controller and responsible for this site (referred to as “ESC”, “we”, “us” or “our” in this Privacy Policy).

If you have any questions about this Privacy Policy or our privacy practices, please contact us using the details below:

Full name of legal entity: ESC EUROPEAN SMART CONSTRUCTION LTD, registration no. HE 343558

Email address: privacy@domido.com

Postal address: Themistokli Dervi, 3, JULIA HOUSE, 1066, Nicosia, Cyprus

You also have the right to make a complaint at any time to the Commissioner for the Protection of Personal Data in Cyprus, the supervisory authority for data protection issues (www.dataprotection.gov.cy). We would, however, appreciate the chance to deal with your concerns before you approach the Commissioner, so please contact us in the first instance.

Other sites and apps, and other third parties may have their own privacy policies, which we encourage you to read before providing information on or through them.

CHILDREN UNDER THE AGE OF 18

Our site is not intended for children under 18 years of age, and we do not knowingly collect personal information from children under 18. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe

we might have any information from or about a child under 18, please contact us at privacy@domido.com.

CHANGES TO THE PRIVACY POLICY

We keep our Privacy Policy under regular review. This version was last updated on the date stated at the beginning of this document. It may change and if it does, these changes will be posted on this page and, where appropriate, notified to you when you next access or log onto our site. The new policy may be displayed on-screen, and you may be required to read and accept the changes to continue your use of our site.

You are responsible for periodically visiting this Privacy Policy to check for any changes.

THE INFORMATION WE COLLECT ABOUT YOU AND HOW WE USE IT

We aim at providing you a great experience through our site while minimizing data collected from the users. Most of the information collected to enable different features of our site cannot be used to identify you. Where we collect personal information, we only use it for the purposes described in this Privacy Policy and apply security measures (including anonymization and encryption).

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

What information do we collect?

We may collect and process information you provide to us when you create and upload content through our site (where applicable) or when you contact us. In addition to the information directly provided by you, we collect and process technical and behavioural information about your device, your use of our site.

[Learn more](#)

We may collect and process the following information:

- **Identity Data:** your first and last name, username, country of residence.
- **Contact Data:** your email address or any other identifier by which you may be contacted online or offline; we also collect records and copies of your correspondence (including email addresses), if you contact us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this site.
- **Usage Data** includes information about how you use our site, products, and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from

us and our third parties and your communication preferences.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal information but will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific site feature. However, if we combine or connect Aggregated Data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this Privacy Policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How is the information collected?

We may use different methods to collect data from and about you, including through direct interactions with you, by use of automated technologies, from third parties (including providers of technical services or analytics providers) and from publicly available sources.

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- **Information you provide to us.** This is information (including Identity and Contact Data) you consent to giving us about you by filling in forms on our site, or by corresponding with us (for example, by email). It includes information you provide when you subscribe for the newsletter or otherwise register on our site and when you report a problem with our site. If you contact us, we will keep a record of that correspondence.
- **Information collected automatically.** Each time you use our site we will automatically process personal information including Technical and Usage Data. We process this data using cookies and other similar technologies. Please see our Cookie Policy for more details.
- **Information we receive from third parties.** You may choose to share certain data with us from third parties, or we may collect such third-party data automatically. For example, we may receive information about you from analytics providers (such as Google).

How do we use the information about you?

We will only use your personal information when the law allows us to do so. Most commonly we will use your personal information in the following circumstances:

To provide you with the site and its content

We need to process certain personal information, so you can use and enjoy different features of our site. This allows us to provide you with the site content in accordance with our Terms of Use.

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- We process Technical Data to operate the site and its features for you. We also use this information to provide technical and customer support to you.
- We use Identity and Contact Data to manage our relationship with you including when you communicate with us (for example, notifying you about changes to our terms of use or Privacy Policy, or for you to subscribe for our newsletter, request information, or make a complaint).
- We may use Identity and Contact Data to enable you to partake in a competition or complete a survey.

In accordance with our legal obligation or legitimate interest

We may need to process certain information to comply with a legal or regulatory obligation, such as to carry out analysis and test our site to ensure their stability and security. We may also use certain personal information to improve our site to deliver a better and more personalized experience to you.

Learn more

In order to provide you an interactive experience, we may use your personal information to:

- administer and protect our business and administer the site, including troubleshooting, data analysis and system testing.
- ensure your safety and security by reviewing user content (for example, when we receive a complaint) and associated metadata for breach of our Terms of Use, and/or other applicable rules.
- ensure the content is presented in the most effective manner for you and your device.
- monitor trends so we can improve our site, products/services, marketing, customer relationships and experiences, and/or offer new or additional features of our site.

We may also use your personal information (including Technical and Usage Data) to help us detect abuse, fraud, and illegal activity on our site to ensure that we provide fair experience to all users.

In addition, we may use your personal information to establish, exercise or defend legal claims.

If you fail to provide personal information

Where we need to collect personal information by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (i.e., to provide you with services available through our site). In this case, we may have to cancel the services you have with us, but we will notify you if this is the case at the time.

WHO WE SHARE INFORMATION WITH

We share your personal information with third-party service providers who help us deliver the site and its content to you and analytics providers. We may also share your information with other companies within the DomiDo Group. Where required by law, we will share your personal information with public

authorities, law enforcement agencies, regulators, or such other authorities.

Learn more

We may disclose aggregated information about our users and information that does not identify any individual without restriction. In addition, we may disclose personal information that we collect, or you provide:

- to our subsidiaries and affiliates.
- to contractors, service providers, and other third parties we use to support our business, including: to administer and provide services, including to run, operate and maintain our site; to perform analytics; to provide technical and customer support; and to process payments (where applicable). Such service providers may also include professional advisers such as lawyers, auditors, and insurers, who provide consultancy, legal, insurance and accounting services.

These service providers will process on our behalf only such personal information as required for the purpose of performing the services. We make sure that each service provider is contractually obliged not to process your personal information for any other purpose.

Some external service providers may also collect information directly from you (such as to process payments, where applicable) in accordance with their own privacy policy.

- to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of ESC's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by ESC about our site users is among the assets transferred.
- to fulfil the purpose for which you provide it.
- for any other purpose disclosed by us when you provide the information.
- with your consent.
- to comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- to enforce our rights arising from any contracts entered into between you and us, including our Terms of Use, and for billing and collection (where applicable).
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of ESC and/or DomiDo Group, our customers, or others.

COOKIES

We may use cookies and/or other similar technologies to distinguish you from other users of the site. This helps us provide you with a good experience when you use our site, allows us to improve the site and its features and helps prevent fraudulent activity.

You can set your browser to refuse all or some browser cookies, or to alert you when sites set or access

cookies. If you disable or refuse cookies, please note that some parts of this site may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

INTERNATIONAL TRANSFERS

We may share your personal data within the DomiDo Group companies. This may involve transferring your data outside the European Union (EU). Some of our external third parties may be based outside the EU, so their processing of your personal data will involve a transfer of data outside the EU.

Whenever we transfer your personal data out of the EU, we ensure a similar degree of protection is afforded to it by ensuring the relevant safeguards are implemented. This may include transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data or using specific contracts with service providers which give personal data the same protection as in the EU.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EU.

DATA SECURITY

All information you provide to us is stored on our secure servers. Once we have received your information, we will use procedures and security features to try to prevent your personal information from being accidentally lost, used, or accessed in an unauthorized way. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our site. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see below to find out more about these rights.

[Learn more](#)

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend

the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful, but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
 - **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at privacy@domido.com.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.