

C.A. Papaellinas Emporiki Limited (HE 27397), operating under the brand name Alphamega (**we**) are committed to protecting your personal data and respecting your privacy.

Introduction

This policy (together with our Terms and Conditions) applies to your use of:

- The “Stick & Win” scheme and mobile application software (the **App**), once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (**Device**). The Stick & Win programme is a reward scheme through which you gain stickers for purchases at Alphamega Hypermarkets which you can later redeem for products when you reach the scheme’s reward goals. More information on the scheme is available at <http://stickandwin.net/> and the scheme’s Terms & Conditions which are available on the website and in the App under Terms & Conditions.
- Any of the services accessible through the App (**Services**). This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This App is not intended for children and we do not knowingly collect data relating to children. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

Important Information and Who We Are

C.A. Papaellinas Emporiki Limited (HE 27397) is the controller and is responsible for your personal data (collectively referred to as "Alphamega", "we", "us" or "our" in this policy).

We have appointed a data protection officer (**DPO**) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

DPO Contact details

- Email address: dpo@alphamega.com.cy
- Postal address: 10 Diomidous Str. 2024 Strovolos, Nicosia
- Telephone number: 22469588

You have the right to make a complaint at any time to the Office of the Commissioner for Personal Data Protection (**Commissioner**), the Cyprus supervisory authority for data protection issues.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

It may change and if it does, these changes will be posted on this page and, where appropriate, notified to you when you next start the App. The new policy may be displayed on-screen and you may be required to read and confirm that you have read it to continue your use of the App or the Services.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

Third party links

From time to time, there may be links in our App to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as Contact Data. Please check these policies before you submit any personal data to these websites or use these services.

The Data We Collect About You

We may collect, use, store and transfer different kinds of personal data about you as follows:

- **Identity Data:** first name, last name, username or similar identifier, gender.
- **Contact Data:** email address and telephone number.
- **Transaction Data:** includes details about transactions performed i.e. amount of stickers transferred, item vouchers issued and amount paid
- **Device Data:** includes a unique device identifier, operating system and mobile device used
- **Profile Data:** includes your first name, last name, gender, telephone number, email if provided and transaction history
- **Usage Data:** includes details of your use of the App.
- **Marketing and Communications Data:** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not

considered personal data in law as this data 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 App feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data 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 Your Personal Data Collected?

We will collect and process the following data about you:

- **Information you give us.** This is information (including Identity, Contact, and Marketing and Communications Data) you consent to giving us about you by filling in forms through the App, or by corresponding with us (for example, by email or chat). It includes information you provide when you register to use the App, download or register the App, subscribe to any of our Services, share data via the App's social media functions, enter a competition, promotion or survey, and when you report a problem with an App or our Services. If you contact us, we will keep a record of that correspondence.
- **Information we collect about you and your device.** Each time you use our Apps we will automatically collect personal data including Device, and Usage Data. We collect this data using cookies and other similar technologies.

How We Use Your Personal Data

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

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

See below for the types of lawful basis that we will rely on to process your personal data.

We will only send you direct marketing communications by email or text if we have your consent. You have the right to withdraw that consent at any time by contacting us.

Purposes for Which We Will Use Your Personal Data

Purpose/activity	Type of data	Lawful basis for processing
To install the App and register you as a new App user	Identity Contact Device	Performance of a contract with you Necessary for our legitimate interests
To deliver Services	Identity Contact Transaction Device Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (to enable redemption of vouchers or bonus) Your consent
To manage our relationship with you including notifying you of changes to the App or any Services	Identity Contact Profile Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (to keep records updated and to analyse how customers use our products/ Services) Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions) Your consent
To enable you to participate in a prize draw, competition or complete a survey	Identity Contact Device Profile Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (to prevent abuse, misuse or other fraudulent use of the scheme, to enable redemption of vouchers or bonus and to analyse how customers use our products/Services and to develop them and grow our business) Your consent
To administer and protect our business and this App including troubleshooting,	Identity Contact	Necessary for our legitimate interests (for running our business, provision of

data analysis and system testing	Device	administration and IT services, network security)
To deliver content and advertisements to you	Identity	Necessary for our legitimate interests (to develop our products/Services and grow our business) Consent
To make recommendations to you about goods or services which may interest you	Contact	
To measure and analyse the effectiveness of the advertising we serve you	Device	
To monitor trends so we can improve the App	Profile	
	Usage	
	Marketing and Communications	
	Location	

Glossary of Lawful Basis for Processing

Consent means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Disclosures of Your Personal Data

We may also share your personal data with third parties for the purposes set out in the table *Purposes for Which We Will Use Your Personal Data* including:

- The following External Third Parties:
 - Service providers acting as processors who provide IT and system administration services.
 - Professional advisers acting as processors including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
 - Regulators and other authorities who require reporting of processing activities in certain circumstances.
- Third parties with which we collaborate for the purposes of operating the Stick & Win scheme and its programmes, including Axiom Consulting Ltd, who provides the platform on which Stick & Win currently operates, as well as the partners and collaborators for each programme, from whom you can earn Stick & Win coupons or redeem your coupons.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

International Transfers

We do not transfer your personal data outside the European Economic Area (**EEA**).

Data Security

All information you provide to us is stored on secure servers on our premises. These servers are owned and operated by Axiom Consulting Ltd, owner of the Merit Loyalty Suite, which is the solution currently powering the Stick & Win scheme. In the event we choose another provider or technology to power the scheme, this might entail changes in where your data is stored.

Your personal data may also be stored by other third parties, via cloud services or other technology, to support the business operations of the Stick & Win scheme.

Any transactions carried out by us or our chosen third-party provider of payment processing services will be encrypted. Where we have given you (or where you have chosen) a password that enables you to access certain parts of the App or the Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way.

We require all data processors to whom we share your data to employ at least the same level of security that we use to protect your personal data.

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.

Data Retention

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request by contacting us.

By law we have to keep basic information about our customers (including Contact, Identity, and Transaction Data) for at least seven years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see *Your legal rights* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

In the event that you do not use the App for a period of 3 years then we will treat the account as expired and your personal data may be deleted.

Your Legal Rights

Under certain circumstances you have the following rights under data protection laws in relation to your personal data.

- **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; or
 - 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.

You also have the right to ask us not to continue to process your personal data for marketing purposes.

You can exercise any of these rights at any time by contacting us at 10 Diomidous Str. 2024 Strovolos, Nicosia or dpo@alphamega.com.cy.

