



ΤΑΜΕΙΟ ΠΡΟΝΟΙΑΣ ΥΠΑΛΛΗΛΩΝ  
ΞΕΝΟΔΟΧΕΙΑΚΗΣ ΒΙΟΜΗΧΑΝΙΑΣ

## PRIVACY NOTICE

### INTRODUCTION

This Privacy Notice sets out how Hotel Employees Provident Fund (the “Fund”) processes data, on individuals (including personal data in respect of individuals who are members, or other third parties that the Fund interacts with, or any individual who is connected to those parties) or otherwise. Where the data held are on individuals, this document also sets out the rights of those individuals in respect of that personal data. This Privacy Notice has been prepared in accordance with the provisions of the EU General Data Protection Regulation (“GDPR”). Any questions relating to this Privacy Notice or requests in respect of personal data should be directed to our Data Protection Officer (DPO) at [dpo@hepfund.com.cy](mailto:dpo@hepfund.com.cy)

This privacy notice is also provided at the following link: [www.hepfund.com.cy](http://www.hepfund.com.cy)

### WHY WE ARE PROVIDING THIS NOTICE TO YOU

The Fund holds certain information about you (“personal data”). This notice is designed to give you information about the data we hold about you, how we use it, your rights in relation to it and the safeguards that are in place to protect it.

The Fund holds personal data about you in its capacity as data controller for the proper handling of all matters relating to the Fund, including its administration and management. This includes the need to process your data to contact you, to calculate, secure and pay your benefits, for statistical and financial modelling and to manage liabilities and administer the Fund generally. Further information about how we use your personal data is provided below.

The legal basis for our use of your personal data will generally be one or more of the following:

- a) we need to process your personal data to satisfy our legal obligations; and
- b) we need to process your personal data for the legitimate interests of administering and managing the Fund and liabilities under it, calculating, securing and paying benefits and performing our obligations and exercising any rights, duties and discretions; and
- c) because we need to process your personal data to meet our contractual obligations to you in relation to the Fund or to take steps, at your request, before entering into a contract.

[www.hepfund.com.cy](http://www.hepfund.com.cy)



## **WHO WE ARE?**

The Fund operates on the basis of the provisions of the Provident Fund, which entered into force on December 28, 2012, the Law 208 (I) of 2012 on the Establishment, Activities and Supervision of the Professional Retirement Funds (hereinafter referred to as " Law"). Pursuant to article 55 of the Law, the Provident Funds Laws 1981 to 2005 and related Regulations and the Establishment, Activities and Supervision of the Professional Retirement Benefit Funds Laws of 2006 and 2007 are abolished. In view of the above, the Fund's operation is governed by the provisions of the aforementioned Law. The Fund is funded by the Employers (Hoteliers) and the Members (Hotels) in order to pay financial benefits to members in case of retirement or termination of employment.

## **WHAT INFORMATION DO WE COLLECT?**

The types of personal data we hold and process about you can include:

- Contact details, including name, address, telephone numbers and email address.
- Identifying details, including date of birth, social insurance number and employee and membership numbers.
- Information that is used to calculate and assess eligibility for benefits, for example, length of service or membership and salary information.
- Financial information relevant to the calculation or payment of benefits, for example, bank account and tax details.
- Information about your family, dependents or personal circumstances, for example, marital status and information relevant to the distribution and allocation of benefits payable on death.
- Information about your health, for example, to assess eligibility for benefits payable on ill health, or where your health is relevant to a claim for benefits following the death of a member of the Fund.
- Information about a criminal conviction if this has resulted in you owing money to your employer or the Fund and the employer or Fund may be reimbursed from your benefits.

We obtain some of this personal data directly from you. We may also obtain data (for example, salary information) from your current or past employer(s) or companies that succeeded them in business, from a member of the Fund (where you are or could be a beneficiary of the Fund as a consequence of that person's membership of the Fund) and from a variety of other sources including public databases, our advisers and government or regulatory bodies.



## HOW DO WE USE PERSONAL INFORMATION?

We will use this data to deal with all matters relating to the Fund, including its administration and management. This can include the processing of your personal data for all or any of the following purposes:

- to contact you.
- to assess eligibility for, calculate and provide you with benefits.
- to identify your potential or actual benefit options, and where relevant, implement those options.
- for statistical and financial modelling and reference purposes.
- to comply with our legal and regulatory obligations.
- to address queries from members and other beneficiaries and to respond to any actual or potential disputes concerning the Fund.
- the management of the Fund's liabilities, including the entering into of insurance arrangements and selection of Fund investments.

## SOURCES AND RECIPIENTS OF DATA

The sources of data may include clients, intermediaries, data subjects directly, third parties connected to the data subject (for example, their employer or another service provider who provides services to the data subject) or open-source material.

Reasonable endeavours are made to ensure that data is only accessible by those with a need for access to fulfil the purposes set out above. Requests for access to be restricted in any particular manner should be made to [dpo@hepfund.com.cy](mailto:dpo@hepfund.com.cy) and will be considered and, where possible with reference to legal and regulatory obligations, actioned.

The following is a list of potential recipients of data (in each case including respective employees, directors and officers):

- employees of the Fund who are acquainted with the GDPR and have signed the Fund's Confidentiality and Non-Disclosure Statement of the Fund;
- investments advisers
- external legal advisers
- IT service providers
- external and internal auditors
- file storage companies, archiving and/or records management companies, cloud storage companies,
- supervisory and other regulatory and public authorities, in as much as a statutory obligation exists



- other service providers (legal, governance or otherwise, including any bank or financial institution providing services in relation to any matter on which the Fund is instructed) where disclosure to that provider of services is considered necessary to fulfil the purposes set out above;
- courts or tribunals.

Unless expressly declared in this Privacy Notice or with the prior consent of the individual, personal data collected from an individual will not be disclosed to any third party other than the above-named parties.

Where the Fund is entering into an engagement with a third party pursuant to which data may be processed by that third party, the Fund will seek to enter into an agreement with that third party setting out the respective obligations of each party and it will seek to be reasonably satisfied that the third party has measures in place equal to those of the Fund to protect data against unauthorised or accidental use, access, disclosure, damage, loss or destruction. In the event that any such third party is outside of the European Union and where the data being transferred would include personal data which would be protected under applicable Data Protection regulation, the Fund will ensure that it meets the relevant requirements of that Data Protection regulation prior to carrying out any such transfer. This may include only transferring the data where the Fund is satisfied that:

- the non-European Union country has Data Protection laws similar to the laws in the European Union;
- the recipient has agreed through contract to protect the information in the same Data Protection standards as the European Union;
- we have obtained consent from relevant data subjects to the transfer;
- if transferred to the United States of America, the transfer will be to organizations that are part of the Privacy Shield.

## YOUR DATA PROTECTION RIGHTS

You have the following rights in terms of your personal data we hold about you:

- Receive access to your personal data. This enables you to e.g. receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction [rectification] of the personal data we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to erase your personal data [known as the 'right to be forgotten'] where there is no good reason for us continuing to process it.



- Object to processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. If you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms.

You also have the right to object where we are processing your personal data, for direct marketing purposes. This also includes profiling in as much as it is related to direct marketing. If you object to processing for direct marketing purposes, then we shall stop the processing of your personal data for such purposes.

## **HOW LONG WE KEEP YOUR PERSONAL DATA**

We will only keep your personal data for as long as we need to in order to fulfil the purpose(s) for which it was collected and for so long afterwards as we consider may be required to deal with any questions or complaints that we may receive about our administration of the Fund, unless we elect to retain your data for a longer period to comply with our legal and regulatory obligations. In practice, this means that your personal data will be retained for such period as you are entitled to benefits from the Fund and for a period of 10 years after those benefits stop being paid. For the same reason, your personal data may also need to be retained where you have received a transfer, or refund, from the Fund in respect of your benefit entitlement.

## **CHANGES TO THIS PRIVACY STATEMENT**

We may modify or amend this privacy statement from time to time.  
Any updates will appear on the Fund's website at [www.hepfund.com.cy](http://www.hepfund.com.cy)

## **COMPLAINTS PROCEDURE**

The Fund has a Data Protection Officer and all enquiries in respect of this Privacy Notice or any requests to exercise any of the rights set out above should be directed to the Data Protection Officer via [dpo@hepfund.com.cy](mailto:dpo@hepfund.com.cy) or by post at: P.O.BOX 26566, 1640 Nicosia Cyprus. If you still feel that your personal data has not been handled appropriately according to the law, you can contact the Office of the Commissioner for Personal Data Protection, at: 1 Iasonos Str., 1082 Nicosia, P.O. Box 23378, 1682 Nicosia, Tel: +357 22818456, Fax: +357 22304565, Email: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)