

# Privacy Policy



## Introduction

At Epsilon Wellness Center, we recognize the importance of protecting your personal information. This Privacy Policy outlines how we, along with any affiliated entities, collect, use, and disclose your data, and informs you of your rights under the General Data Protection Regulation (EU 2016/679) and applicable laws in Cyprus and the European Union.

## How We Collect Your Data

We collect only the personal data necessary to provide our services, improve user experience and comply with legal or contractual obligations. We may obtain your personal data in the following ways:

- Directly from you;
- From your employer or an authorized intermediary;
- Through communication via telephone, email, online forms, fax, or other electronic means (which may be monitored, recorded and stored);
- From your representatives, advisers, intermediaries or custodians;
- From public sources or third parties, particularly when background checks are required;
- When you meet with us at wellness events, fairs, or in person and share your contact information;
- Through cookies on our website – details are available in our Cookie Policy settings.

## Data We Collect

We may collect the following types of personal data:

- Your name, contact details (including address, phone number, and email) and where applicable, job title;
- Identification information such as your date of birth, passport or ID number, nationality, and related documentation;
- Financial details where relevant, such as payment records;
- Details regarding your wellness goals and preferences related to our services;
- Information concerning your employment, education, personal background and wellness-related interests;

## Processing Your Personal Data

### 1. Performance of a Contract

We process your personal data when necessary for providing the services you request or preparing to enter into an agreement.

This may include:

- Drafting service proposals;
- Delivering agreed services;
- Responding to feedback or complaints;
- Any additional processing directly related to the services you requested.

We may share this information with:

- Your representatives, advisers or intermediaries;
- Third-party service providers, including affiliated entities;
- Our professional advisers (e.g., legal, IT, or financial consultants);
- Debt recovery agencies, where applicable;
- Cyprus courts or public authorities where legally required;
- Other third parties introduced to you, where identified in advance.

## **2. Legitimate Interests**

We also process your data where it supports our legitimate interests or those of others, including:

- Direct communication and marketing (see section below);
- Internal training or performance monitoring;
- Business management, including data analysis or debt recovery;
- Receiving advice on our legal or compliance responsibilities.

We may share your data with:

- Our advisers or agents when needed;
- Third parties and their advisers in the event of a potential acquisition or restructuring of our business.

## **3. Consent**

Where required, we may rely on your freely given consent to process your data for specific purposes not outlined above. You may withdraw your consent at any time. Withdrawal does not affect the legality of any processing done prior to the withdrawal.

## **4. Legal Obligations**

We also process personal data to comply with legal or regulatory requirements.

This includes:

- Complying with health, safety and wellness-related obligations;
- Fulfilling statutory or other reporting obligations under Cyprus law.

We may share your data with:

- Professional advisers for legal or regulatory support;
- Auditors where required;
- Background check providers where necessary;
- Public authorities, regulators, or law enforcement agencies.

## Marketing

We may send you updates on our wellness services, newsletters, or event invitations we believe may interest you. We do not share your data with external third parties for marketing purposes.

Communications may be sent via post, telephone, email or other electronic methods.

You can opt out or withdraw consent at any time by contacting us at: [info@epsiloncenter.com](mailto:info@epsiloncenter.com)

## Transfer and Processing Outside the EU

When personal data is shared with third parties located outside the EU, this will only occur under one of the following conditions:

- The destination country is recognized by the European Commission as providing adequate protection;
- The recipient in the United States is registered under the EU/US Privacy Shield (if applicable);
- Standard contractual clauses approved by the European Commission are in place;
- You have explicitly consented to the transfer.

## Retention of Your Data

We retain personal data only for as long as necessary:

- If collected under legal or compliance frameworks, data is retained for seven years following the end of our relationship, unless otherwise required by law;
- In other cases, we keep personal data for seven years following the end of the service or contract in case of future legal claims.

Your data is stored securely and the access is password-protected.

We apply appropriate organizational and technical safeguards, physical, electronic and procedural to prevent unauthorized access, alteration, or destruction. Access is limited to personnel who require the information and are subject to confidentiality obligations. Users are advised not to transmit sensitive data via unsecured email.

## Processing as Controller for Agents and Intermediaries

If you act as an agent or intermediary and share individual data with us, you agree to:

- Inform those individuals about our privacy terms;
- Ensure any data shared with us complies with applicable data protection laws;
- Prevent the disclosure of unnecessary personal data;
- Maintain appropriate safeguards against unauthorized access or breaches;
- Notify us without delay in the event of any data breach that may affect us or the individuals concerned.

## Your Rights Under the GDPR

Under the GDPR, you have the right to:

- Access the personal data we hold about you;
- Request that we stop processing your data if it is causing harm or distress;
- Object to receiving marketing communications;
- Request erasure of your personal data;
- Request restriction of processing;
- Receive your data in a portable format to transfer to another controller;
- Request corrections to your personal data if inaccurate.

Please note: These rights are subject to certain legal limitations.

## Changes to This Policy

This Privacy Policy may be updated from time to time. We will not reduce your rights without your explicit consent. Any changes will be posted here, and the latest version will include an updated effective date.

## Contact

For questions or data-related requests, please contact us at: [info@epsiloncenter.com](mailto:info@epsiloncenter.com)

To file a complaint, contact the Data Protection Commissioner of Cyprus:  
[www.dataprotection.gov.cy](http://www.dataprotection.gov.cy)