

1. Collection of Information

Our Personal Data Protection Policy governs the use and storage of your data. You can see our Personal Data Protection Policy at <http://www.paragoneurope.eu>. Paragon Ltd., with Company Registration C31486, is a Controller of the personal data you (data subject) provide us.

This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal data.

We collect the following types of personal data from you;

- your name and surname
- your home or work address
- your email address
- your mobile phone or landline number
- Next of kin in case of emergency
- your identity card or passport number
- your nationality
- your sexual orientation
- your institution name
- your place of work
- credit card details
- any allergies
- Curriculum Vitae
- Criminal record (in certain cases)
- information related to the browser or device you use to access our website;

2. Purpose of Information

We need your personal data:

- to establish and fulfil a contract with you, for example, if you enter into an agreement to provide or receive services. We might also need to pass on this information to national, international and/or government agencies;
- to maintain an effective communication channel with you throughout the term of a service, to manage our relationship with you as our customer and to improve our services and enhance your experience with us in the future;
- to respond, with your express consent, to any comments or complaints we may receive from you;
- to personalise our communications to you;
- to protect Paragon Ltd., legitimate business interests and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- to monitor any customer account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law and our legitimate interests;

Where applicable you have been given an opportunity to opt-out. You will continue to be able to opt-out of electronic communications at any time by following the instructions in the relevant communication.

We may also collect your IP address automatically as you interact with our website. This is in the interest of ensuring that there is no malicious use of the website and maximum protection to your data.

3. Processing of Information

Your personal data is processed in our offices in Malta. Hosting and storage of your data takes place in our Microsoft Office 365 cloud system which is located in the EU.

Microsoft has extensive expertise in protecting data, championing privacy, and complying with complex regulations, and currently complies with both [EU-U.S. Privacy Shield](#) and [EU Model Clauses](#).

We may also share your personal data with the below third parties:

- our professional advisors such as our auditors and external legal and financial advisors;
- certifying bodies and external collaborators, hosting organisations working in collaboration with Paragon Ltd., for the delivery of our services;
- search engine and web analytics.

No other third party providers have access to your data, unless specifically required by law.

4. Duration

Under Maltese law, we are required to keep your documents according to the Data Retention Policy. After this period, your personal data will be irreversibly destroyed. Any personal data held by us for marketing and service update notifications will be kept by us until such time that you notify us that you no longer wish to receive this information.

We will not retain your data for longer than is necessary to fulfil the purpose it is being processed for.

Where you are a customer, we will keep your information for the length of any contractual relationship you have with us and after that for a period of 10 years due to local and European Governance that impinge on Paragon Ltd. In cases of legal issues, these are retained until the relevant court case is resolved.

Where you are a prospective customer and you have expressly consented to us contacting you, we will only retain your data (a) until you unsubscribe from our communications; or, if you have not unsubscribed, (b) while you interact with us and our content.

5. Customer Rights

Should you believe that any personal data we hold on you is incorrect or incomplete, you have the ability to request to see this information, rectify it or have it deleted, please contact our secretary on secretary@paragoneurope.eu

Where you have consented to us using your personal data, you can withdraw that consent at any time.

In the event that you wish to complain about how we have handled your personal data, please contact our Senior Manager, in writing, at maria.vella@paragoneurope.eu or at 183 Constitution Street, Mosta Malta. Our Senior Manager will then look into your complaint and work with you to resolve the matter.

If you still feel that your personal data has not been handled appropriately according to the law, you can contact the Information & Data Protection Office (IDPC) located in Sliema and file a complaint with them.