

Privacy Policy

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1. Introduction:

cl.world (“CityLife”) provides access, content and such services that from time to time require the collection of certain information from you (CityLife, throughout this privacy policy, referred as “CityLife”, “we”, “us”, or “our”). This privacy policy is issued on behalf of CityLife as the controller and processor of the data collected through the use of this website (cl.world).

CityLife is committed to privacy, data protection, the responsible use of information and the need to safeguard the privacy of its clients, users, partners and visitors of its website at all times. Additionally, CityLife is committed to maintaining compliance with the General Data Protection Regulation (GDPR) and the Data Protection Act of 1988, as amended, of the Republic of Ireland. CityLife ensures that the data you supply is processed fairly and lawfully, and with skill and care. CityLife takes this responsibility in respect of your personal data extremely seriously.

This privacy policy is a statement that sets out our commitment, the conditions, and forms under which we collect and process information, including personal and identifiable information through the use of our website, our services or any other relationship we maintain with you, including any information that you may provide us through this website when you contact us for any reason such as joining our marketing list, applying for a role with us, registering for an event, downloading content, requesting information about our services, sending us a request for a proposal or quote, or filling in a survey. Our website is not intended for children and we do not knowingly collect data relating to children through this website.

Should you have any questions regarding the handling of your data and this privacy policy, including any requests to exercise your legal rights please contact us at info@cl.world

You have the right to make a complaint at any time to the supervisory authority of your jurisdiction. We would, however, appreciate if you would allow us to deal with your concerns before you approach the relevant supervisory authority.

Our website may include links to third-party websites, plug-ins and applications as well as embedded content such as videos, leaflets and other related content. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data CityLife collects about you:

Personal data, or personal information, means any information that identifies an individual. It does not include data where the identity has been removed. We may collect, use, store and transfer different kinds of personal data about you, such as: email address, first name, last name, passport photo, date of birth, nationality, phone number, address, utility bill, password of your registered account with us (hashed) and any other information we consider relevant to the provision of our services and the adequate use of our website.

We do not share certain identifiable information with third parties for the purposes of identity verification in compliance with Customer Due Diligence (CDD), Know Your Client (KYC), and Anti Money Laundering (AML) policies and regulations we handle compliance internally. We may also collect, use and share “Aggregated Data” such as statistical or demographic data for any purpose. Aggregated Data may be

derived from your personal data but is not considered identifiable information in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website 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 that 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.

3. How is your personal data collected?

We use different methods to collect data from and about you including through direct and automated technologies interactions. You may give us your Identity and Contact Data by filling in forms or by corresponding with us on this website. This includes personal data you provide when you subscribe to our service, events or publications; request marketing to be sent to you; send us information about a request for proposal; contact us in relation to a business, media, supplier or career enquiry; apply for a role with us; or give us some feedback.

As you interact with our website, we may automatically collect Technical Data about your equipment through automated technologies or interactions, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.

4. How we use your personal data?

We will only use your personal data when the law allows us to use it. Most commonly, we will use your personal data where we need to perform the contract we are about to enter into or have entered into with you; where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests; where we need to comply with a legal or regulatory obligation.

You have the right to opt out at any time by contacting us and we will stop collecting and/or processing your data and we will proceed to delete it completely from our systems.

5. Why we use your personal data?

We use your personal data mainly to comply with CDD, KYC and AML policies and applicable regulations. It is a core part of our service to maintain the highest degree of diligence and reputation in front of you, other users and clients, business partners, and third party service providers.

Furthermore, we use your personal data to manage our relationship with you (e.g. to inform you about changes on our terms and/or privacy policy), this use of personal data fall within the lawful basis for collection of personal data (i.e., performance of a contract with you; necessary to comply with a legal obligation; necessary for our legitimate interest). We may also use your personal data to protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) forming part of our legitimate interest.

We will only use your personal data for the purposes that we collected it for, 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. 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.

6. Disclosures of your personal data

We may disclose your Personal Data to third parties, including but not limited to the following:

- to our group of companies for the purposes described in the given Privacy Policy;
- to third parties that provide us with services and help us and our group of companies manage our business. For example, sometimes a third party may have access to your personal data in order to maintain our information technologies or process mailings on our behalf.

- our legal and other professional advisors;
- as needed for complying with legal requirements, for serving justice, protecting vital interests, protecting the security or integrity of our databases or Website, or for taking precautions against legal liabilities;
- to regulatory authorities, courts, and government agencies to comply with legal regulations, legislative or regulatory requirements, and government requests; and
- the Company may involve third parties to manage the Website and provide other services related to the Website, such as collecting and analyzing data. Such third parties may have access to certain personal information that you provide as needed for the provision of such services on behalf of the Company; provided, however, that all such third parties abide to protect the disclosed personal information in accordance with the given Privacy Policy.

7. International Transfers:

We share your personal data with our head office and our business partners or service providers when this is absolutely necessary. This will involve transferring your data outside the European Economic Area (EEA).

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented: a) where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model Contracts for the transfer of personal data to third countries (https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en). b) where we use providers based in the US, we may transfer data to them either based on Model Contracts, or if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield (https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en).

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

8. Data security:

We have a SSL certificate and “Two Factor Authentication” (2FA) mechanism in our website and we have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to some employees, agents, contractors and other third parties who do not require processing your personal data. Further, we use pseudonymisation and encryption of your personal data to secure its storage within our systems.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data retention:

We will only retain your personal data for as long as it is necessary to fulfill the purposes we collected it for. Including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period of personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized 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 requirements.

Under the law, we keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. In some circumstances we may 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.

10. Your rights:

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 your 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.

Object to processing of your 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 your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

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 may refuse to comply with your request in these circumstances. 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. We try to respond to all legitimate requests within one month. Occasionally it may 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. We will, nevertheless, in all cases confirm a reception of your request within 72 hours from the time we receive your request.