

# CYPRUS SWIMMING FEDERATION (CSF)



**K.O.E.K.**  
ΚΥΠΡΙΑΚΗ ΟΜΟΣΠΟΝΔΙΑ ΚΟΛΥΜΒΗΣΗΣ  
CYPRUS SWIMMING FEDERATION

## PRIVACY POLICY

Last update  
August 18, 2022

### **Introduction**

The Cyprus Swimming Federation (CSF) is committed to the protection of privacy and the personal data it processes. As of the 25<sup>th</sup> of May 2018, the General Data Protection Regulation (EU 2016/679), also known as the GDPR, applies, which strengthens the legal framework for the protection of data subjects regarding the processing of personal data in the European Union.

Also, the "Protection of Natural Persons Against the Processing of Personal Data and the Free Circulation of this Data" Law (125(I)/2018) is in force, in adaptation and harmonization with the GDPR. CSF, with respect to personal data, complies with the GDPR in the context of its operations and procedures and takes the foreseen and available technical and organizational measures as provided in the regulation, and the legislation in general.

At CSF, we are committed to protect the privacy of the information and personal data you entrust to us and to manage your personal information in a fair and transparent manner. The following privacy policy applies to the personal data processed by CSF, which is a registered federation at the Cyprus Sports Organization with registration number 0004, located at 21 Amfipoleos, 2025 Strovolos, Nicosia.

This privacy policy describes what personal data or information we collect from you, when and why we use this information and to whom we share it. In addition, it indicates your rights in relation to your information, as well as to whom you can contact for additional information or any questions you may have.

You can read more about this privacy policy by following the paragraphs below:

1. What type of personal data do we retain about you?
2. What personal data is collected and how?
3. How do we use the personal information we retain?
4. The legal grounds we use for processing your personal information.
5. To whom we disclose your information.
6. Protection of your personal information.
7. How long do we keep your data?
8. Your rights.
9. Right to complain.
10. Changes to this privacy policy.

### **1. What type of personal data do we retain about you?**

CSF collects different categories of personal data about you, depending on the purpose for which we process it. These are:

- ✓ Identification data (name, surname, identity card number, passport number, telephone number etc.)
- ✓ Demographic data (address, place of residence)
- ✓ Medical data
- ✓ Professional information
- ✓ Education data
- ✓ Contact information
- ✓ Financial information
- ✓ Sports data

The personal data we collect is limited and necessary for the purpose of the processing and is processed with a specific legal basis. The mission of CSF is the cultivation and development of the sports that fall under Swimming, the training of athletes, coaches and professionals by the drafting and implementation of regulations, the organizing, staging and supervision of local, national, and international competitions and the representation of Cypriot swimming to any public authority, FINA or any other recognized sports confederation or association.

When on this policy we refer to “our Website”, we mean the website <https://koek.org.cy/>.

## 2. What personal data is collected and how?

The personal data we collect may include, but is not limited to name, date of birth, ID number, the name of your father and your mother, your e-mail address, home address, country, telephone contact numbers, passport number, IP address, the type and language of your browser, access times, and other similar information.

The personal data is collected:

- ✓ With your registration in the CSF’s registries
- ✓ By including you in the Cyprus Sports Organization conscript plans
- ✓ By registering your results
- ✓ With your participation in local and international competitions
- ✓ By hiring you as a federation coach
- ✓ With your participation in a game or event as an *athlete, referee, officials* and generally as a member of a game organized by CSF.
- ✓ By registering you on event’s score sheet organized by CSF
- ✓ By entering into an agreement with CSF as a partner or supplier.
- ✓ By submitting personal or electronic applications and resumes for recruitment to CSF.
- ✓ By submitting your application for participation in seminars organized by CSF or abroad.
- ✓ With your participation in activities and events organized by CSF
- ✓ With your consent to appear in publications in the media outlets CSF manages.
- ✓ With your participation as a member of the Board of Directors of the Federation

We may also collect and / or obtain or export your personal data by observing how you interact with us. For example, to enhance your experience when using our website and to ensure that the website works effectively, we (or the service providers) may use cookies (small files stored in your browser) which may collect personal data. More information on how to use cookies and other tracking technologies and how you can control them, can be found in the Cookies Policy posted on our website.

We collect information about you that falls under the sensitive or 'special categories' of personal data, such as details about your health and your nationality. Please note that the processing of sensitive personal data is prohibited by law, and your express consent is required whenever we may need to collect sensitive personal data.

We understand the importance of protecting children's privacy. The athlete registration process also includes children under the age of fourteen. The collection of their personal data is done after the consent of their parents.

### 3. How do we use the personal information we retain?

We will process your personal data only if it is allowed by the legislation. Usually, we will use your personal information in the following cases:

- ✓ **For the registration of athletes in the registry of CSF.**
- ✓ **For the registration of referees, judges, and officials in the relevant registries of CSF.**
- ✓ **For your participation as a coach or official in local or international games and events.**
- ✓ **For the transfer of athletes.**
- ✓ **For the recruitment of federation coaches**
- ✓ **During the officials' definitions by the CSF and/or the Definitions Committee.**
- ✓ **From your participation in game and events organized by CSF.**
- ✓ **From your participation in international games and/or events**
- ✓ **To sign contracts with suppliers and associates.**
- ✓ **To comply with our legal obligations.**
- ✓ **To process your requests.**
- ✓ **To evaluate your application and/or CV.**
- ✓ **For your registration and participation in seminars organized in Cyprus and abroad.**

You may withdraw your consent to any such processing at any time by contacting us at [koek@logos.cy.net](mailto:koek@logos.cy.net) or by using the "Unsubscribe" function in any communication for information purposes, including emails, which we will probably send you.

Please note that any processing of personal data prior to the withdrawal of your consent is not affected.

#### **Special categories of data (sensitive data)**

To the extent that we process any sensitive personal data relating to you for any of the above purposes, we will do so because either:

- you have given your explicit consent to the processing of your information,
- processing is necessary to comply with our obligations under employment, social security, or social protection legislation,
- the processing is necessary for the establishment, exercise, or support of legal claims, or
- you have made your data publicly available.

#### **Use of personal data collected through our website**

In addition to the above purposes regarding the operation of Demetra Holdings PLC, we may also process your personal data collected through our website:

- ❖ to manage and improve our website,
- ❖ to customize the content of our website to contain information about our announcements, information, actions, and activities that may be of interest to you,
- ❖ to manage and respond to any request you submit to us through our website.

#### **4. The legal grounds we use for processing your personal information**

The legal bases on which we base the processing of personal data are:

- ✓ When you have consented to the processing of your data, for one or more purposes.
- ✓ When processing is necessary to execute a contract to which you are a party.
- ✓ When processing is necessary for our compliance with our legal obligations.
- ✓ When processing is necessary to protect the vital interests of the data subject or of another natural person
- ✓ When processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- ✓ When processing is necessary for the purposes of the legitimate interests pursued by CSF, except where such interests are overridden by the interests or fundamental rights and freedoms of you, the data subject.

#### **5. To whom we disclose your information**

In relation to the purposes described in this Privacy Policy, we may share your personal data with the following third parties:

- ✓ To the organizers of international competitions
- ✓ To external partners (accountants, auditors etc.) whose purpose is to control the procedures of CSF
- ✓ To suppliers and associates whose purpose is to improve the services offered by CSF
- ✓ To other third parties whose purpose is the organization, the fulfillment of the purposes, and the smooth operation of CSF.

As part of the tasks assigned to them by CSF as the “controller” and in accordance with the GDPR, either under a contract or other legal act, the employees and the associates of CSF have access to your personal data, as “processors”.

Further information regarding the above transfers and the adequate guarantees used by the federation for these transfers (including copies of relevant agreements) can be obtained by contacting the Data Protection Officer of CSF at 22 449840 or by e-mail at [koek@logos.cy.net](mailto:koek@logos.cy.net).

## 6. Protection of your personal information

We have implemented several technical and organizational measures to ensure that your personal data is secure, accurate and up to date. These measures include:

- ❖ Training of our staff to ensure that we know our obligations regarding the protection of privacy and the protection of personal data in their management.
- ❖ Administrative and technical checks and controls to restrict access to personal data based on the "need for knowledge".
- ❖ Technical checks and controls including protection programs, encryption, and anti-virus software.
- ❖ Physical security measures, such as special staff access to our facilities.

## 7. How long do we keep your data?

CSF processes your personal data for the following periods:

- ✓ For as long as necessary for the purpose for which we collected your personal data.
- ✓ For any retention period required by law.
- ✓ Until the end of the period in which legal proceedings or investigations may arise regarding the purpose for which we collected your personal data.
- ✓ For as long as required, which covers the period you are entitled to take legal action against CSF.

Finally, we will retain your personal data in accordance with the Retention and Destruction Policy which can be made available to you upon request.

## 8. Your rights

Under the General Data Protection Regulation, you have rights regarding the processing of your personal data. More specifically:

- ✓ **Transparent information (article 12):** You have the right to concise, transparent, comprehensible, and easily accessible information without delay and in any case a response within one month of receipt of the request.
- ✓ **Information and Access to personal data (articles 13 and 14):** When obtaining consent, CSF will inform you about the purposes of collecting your personal data,

the period of their storage, to whom the data will be shared and information about the processing of your personal data.

- ✓ **Right of access (article 15):** You have the right to be fully informed about your personal data we process. You can request a copy of your personal data and we are obliged within a specified period to deliver it to you.
- ✓ **Right to rectification (article 16):** You have the right to request correction or modification or completion of your personal data that we hold and process either because it is incomplete or because it is incorrect.
- ✓ **Right to erasure (article 17):** You have the right to request the deletion of your personal data immediately and without delay. Your request will be satisfied unless CSF as the “Data Controller” has an overriding legal interest.
- ✓ **Right to restriction of processing (article 18):** You have the right to request that we suspend the processing of your personal data when one of the following applies:
  - Your personal data is not accurate.
  - The processing of your personal data is illegal and you object to their deletion and instead you request the restriction of their processing.
  - Your personal data is no longer necessary for processing, but is required by you to establish, exercise, or support legal claims.
  - When you have objections to their processing and await verification as to whether the legal reasons invoked by CSF prevail over your own reasons.
- ✓ **Notification obligation (article 19):** You have the right to be informed about the notification of third parties by CSF, to whom your personal data was disclosed, even in the cases of their correction and/or deletion.
- ✓ **Right to data portability (article 20):** You have the right to receive your data in a commonly used format and transmit it to another organization (if this is technically possible).
- ✓ **Right to object (article 21):** You have the right to object to the processing of your personal data unless we have an overriding legal interest in continuing the processing.
- ✓ **Automated individual decision-making, including profiling (article 22):** You have the right not to be subject to decisions made solely based on automated processing including profiling.

At any time, you have the right to report CSF to the Data Protection Commissionaire. Also, you have the right to withdraw your consent to the processing of your personal data for specific purpose. Any withdrawal of consent will not affect the lawfulness of processing that was based on your consent before it was withdrawn by you.

Some of your rights may not be exercised if there are reasons as described in Article 23 of the GDPR.

You will not have to pay any fee to access your personal data or to exercise any of your rights. However, we may charge a reasonable fee if your request for access is obviously unfounded or excessive. Otherwise, in such circumstances, we may refuse to comply with your request.

When submitting your request, and to help us verify your identity in order to ensure your right to access your personal data (as well as your other rights), we may ask you for certain information as an appropriate security measure to ensure that the your personal data will not be shared with a person who does not have the right to receive it.

To exercise any of your rights or if you have any other questions regarding the processing of your personal data by us, you may email to the DPO at [koek@logos.cy.net](mailto:koek@logos.cy.net) or write to us at:

Data Protection Officer,  
Cyprus Swimming Federation (CSF),  
21 Amfipoleos,  
2025 Strovolos, Nicosia,  
Cyprus.

You may also use the above contact details to file a complaint regarding the processing and the protection of your personal data.

## 9. Right to complain

If you are not satisfied with the way we handled your personal data or any of your questions or requests, you have the right to file a complaint with the Office of the Personal Data Protection Commissioner in Cyprus. If you would like to contact the Commissioner's office, please contact us for assistance.

## 10. Changes to this privacy policy

CSF reserves the right to revise the Data Protection Policy whenever and wherever it deems necessary. For your better information, in case of changes to this Policy, we will update the revision date which is located on the first page. The amended Privacy Policy will apply from the date of revision and will be posted on the CSF website.