

Privacy Policy

Version 1.0

July 29, 2025

At Canoe, we fully respect your fundamental right to privacy as enshrined in the Charter of Fundamental Rights of the European Union and governed by the General Data Protection Regulation (Regulation (EU) 2016/679). We are committed to strict GDPR compliance and the protection of personal data of all individuals who interact with us.

1. Our formal company name is Canoe LTD, with the registration number HE 361592 and registered address Griva Digeni 51, ATHINEON COURT Flat/Office 202, 8047 Paphos Cyprus (hereinafter "Company," "we," "us," or "our").
2. This privacy policy applies to the personal data of the following categories of data subjects:
 - Business customers of Canoe, including those entering into contractual agreements with us, along with their authorized representatives;
 - Job applicants submitting their applications via LinkedIn, our website, or email;
 - Visitors to our website and anyone who communicates with us via contact forms or email.
3. In compliance with the GDPR, processing personal data requires both a defined purpose and a lawful basis. At Canoe, we process personal data based on one or more of the following legal bases:
 - (i) performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract;
 - (ii) compliance with a legal obligation;
 - (iii) our legitimate interests.

In exceptional cases, we may process your personal data with your explicit consent, which you have the right to withdraw at any time.

4. We process personal data for the following purposes, each supported by a corresponding lawful basis under the GDPR:

4.1. Handling and maintenance of our business relationship with you

This covers the processing of personal data necessary to maintain effective communication with you and your representatives in relation to our services and business interactions.

Legal basis: (i) Legitimate interest or (ii) Performance of a contract. We believe timely communication supports both our needs and ensures smooth collaboration.

4.2. Assessment of job applications

We review and evaluate job applications to identify suitable candidates and ensure a good fit for our organization.

Legal basis: Legitimate interest. This process serves both your and our interests by facilitating fair and effective recruitment.

4.3. Compliance with legal obligations

We process personal data to fulfill our legal and regulatory obligations, including accounting, tax reporting, and other statutory requirements.

Legal basis: Legal obligation. These processes are mandatory under applicable laws.

4.4. Legal claims

We may process data to assess, defend, or pursue legal claims and to reorganize or scale our business operations.

Legal basis: Legitimate interest. Protecting our legal rights and ensuring business continuity is essential for our operations and your service stability.

5. We start processing personal data about you directly when you interact with us, such as by signing up for our services, contacting us or applying for a job with us.

We collect personal data directly from you or your organisation. We may also obtain information about you from publicly available sources, e.g. if you have provided us with a link to your LinkedIn profile.

6. We process the following categories of personal data, depending on your relationship with us:

(i) Contact Information

Includes your name, email address, and phone number (optional).

Data subjects: Business customers, Website visitors (who choose to contact us), Job applicants.

(ii) Message Content

Information you provide via website forms, email, which may include your personal data.

Data subjects: Business customers, Website visitors (who choose to contact us), Job applicants.

(iv) Job Application Information

Details included in your cover letter and CV, such as age, date of birth, education, work experience, hobbies, grades, certificates, notice period, interview notes, salary expectations, and references.

Data subjects: Job applicants.

(v) Payment and Financial Information

Includes personal data necessary to process transactions, such as the name of the individual responsible for payment, billing address, payment card or bank account details, invoice contacts, and related financial information.

Data subjects: Business customers.

7. We do not knowingly collect personal information from anyone under 16 or allow them to use our Service. If you are under 16, please do not submit any personal details such

as your name, address, phone number, or email. If we discover that we have collected information from a child under 16, we will delete it promptly.

8. To provide and maintain our services and website, we share certain personal data with trusted third-party partners who process personal data on our behalf. These partners include, but are not limited to:

- Suppliers of IT systems and cloud hosting services, who process data on our behalf as data processors;
- Communication systems providers, who facilitate the exchange of information through email, messaging, and other communication channels on our behalf.

We conduct thorough due diligence to ensure that all such partners meet stringent data protection standards and comply fully with the requirements of the General Data Protection Regulation (Regulation (EU) 2016/679) and applicable EU data protection laws. We have entered into binding data processing agreements with these partners, which require them to handle your personal data in strict accordance with our instructions and to implement appropriate technical and organizational measures to protect your data.

In some instances, our partners may operate or store data outside the European Economic Area (EEA). In those cases, we ensure that all international transfers of personal data are conducted in compliance with the GDPR's cross-border data transfer requirements. This primarily involves using the European Commission's approved Standard Contractual Clauses (SCCs), supplemented by additional safeguards where necessary to guarantee an adequate level of protection for your personal data.

10. We retain your personal data for the purposes described above throughout our contractual relationship with you, as well as for any additional period during which we maintain meaningful contact, or as required by applicable law. Once the reasons for processing your data no longer apply, we will discontinue processing and securely delete your personal data.

11. Under the GDPR, you have the following rights regarding the personal data we process about you:

- Access: You can request a copy of the personal data we hold about you.
- Rectification: You can ask us to correct or complete any inaccurate or incomplete information.
- Erasure: You may request that we delete your personal data when there is no valid reason for us to keep it, if you have withdrawn your consent, if you object to the processing, if we have processed it unlawfully, or if the law requires deletion.
- Restriction: You can ask us to limit how we use your data, for example, if you dispute its accuracy while we verify the information.
- Objection: You have the right to object to our processing based on legitimate interests. If you do, we will stop processing unless we can demonstrate compelling reasons that override your interests or if processing is required to protect legal claims.

- **Data Portability:** Where applicable, you can request a copy of your data in a common, machine-readable format and have it transferred to another service provider.

You can exercise these rights at any time by contacting us through your account settings or via **contact@canoeband.com**. We are committed to respecting your privacy and responding promptly to your requests.

12. If you believe that our processing of your personal data infringes the GDPR, you have the right to lodge a complaint with a supervisory authority in the EU member state where you usually reside, work, or where the alleged infringement occurred.

13. We may update this privacy policy from time to time in response to changing legal, technical or business developments. Whenever we make changes, we will notify you by revising the date at the top of this privacy policy. To stay informed about how we process your data and your rights, please review this privacy policy regularly.