*Version 1.*

# Privacy Policy - Release Candidate

**1. Who we are**

Release Candidate Ltd is a Cyprus-based company providing software development, software integration, IT consulting and back-office IT support to businesses, including investment firms.

We act as a data controller when we process personal data to operate rc-technologies.com, respond to enquiries and manage our business relationships. Section 2 explains how we handle personal data when providing services on behalf of another organisation.

For privacy questions, email hello@rc-technologies.com or write to Release Candidate Ltd, Florinis 11, City Forum, Floor 1, Office/Flat 102, 1065 Nicosia, Cyprus.

**2. Software and back-office IT services for clients**

When we develop, maintain or support a client's software or back-office systems, authorised personnel may need access to personal data held in those systems. Depending on the work, this may include user or account identifiers, system logs and information contained in support tickets or other client records. We use this access to carry out agreed tasks such as troubleshooting, testing, maintenance and integration.

When we process personal data on behalf of another organisation, we act as a processor or sub-processor, depending on the arrangement. We handle the data in accordance with documented instructions and the applicable data processing agreement. Access is limited to authorised personnel who need it for the work and are subject to confidentiality obligations.

If the information concerns an account or service you have with an investment firm or another organisation, please refer to the relevant controller's privacy notice and direct your data protection requests to that controller. We assist the controller with requests relating to the data we process on its behalf.

**3. Information we collect for our own purposes**

- Enquiries. We collect the details you provide when contacting us. The website contact form requires your name, email address and message. Your company name and telephone number are optional.

- Business relationships. We may receive your name, role, work contact details and information about your involvement in a project or contract, either from you or from the organisation you represent.
- Website visits. We may collect technical information such as your IP address, browser and device information, and the pages and times of requests.

**4. Why we use your information**

| Purpose | Legal basis under the GDPR |
|---|---|
| Responding to enquiries and managing relationships with clients, suppliers and business contacts. | Our legitimate interests in handling correspondence and managing our business relationships under Article 6(1)(f). |
| Performing a contract with you personally or taking steps you request before entering into one. | Contractual necessity under Article 6(1)(b). |
| Operating and securing our website and systems, troubleshooting issues and preventing spam or misuse. | Our legitimate interests in maintaining secure and reliable systems under Article 6(1)(f). |
| Meeting statutory recordkeeping requirements or responding to legally binding requests. | Compliance with a legal obligation under Article 6(1)(c). |
| Handling disputes and establishing, exercising or defending legal claims. | Our legitimate interests in protecting our legal rights under Article 6(1)(f). |

**5. Who receives your information**

For our website and business operations, we may share relevant information with providers of website hosting, form handling, communications, security and IT support. We may also

share information with professional advisers where needed for advice or a dispute, and with courts or competent authorities where required by law.

**6. Cookies and website security**

We use cookies and similar technologies to support website functionality and help protect the contact form from spam and abuse. Where a technology requires consent, we ask for it before use. You can withdraw or change your consent through the same website controls used to give it. You can also manage cookies in your browser settings.

**7. International transfers**

Some service providers may process or access personal data outside the European Economic Area, including in the United States. Where a transfer is covered by a European Commission adequacy decision, we rely on that decision. Where contractual safeguards are required, we use the European Commission's Standard Contractual Clauses and any additional measures required. You can contact us for details of the safeguards that apply or to request a copy.

Transfers of data we process on behalf of clients follow the applicable documented instructions, data processing terms and legal requirements.

**8. Retention and security**

We keep enquiry information while we respond and for any active proposal or agreed follow-up. We retain business records for as long as needed to manage the relationship and meet applicable legal or claims periods. We retain technical records for the time needed to operate and secure our systems or investigate issues.

We use technical and organisational safeguards appropriate to the risks. For data we process on behalf of clients, retention, return and deletion follow the applicable instructions, agreement and legal requirements.

**9. Your rights**

Depending on the circumstances, you can ask us to access, correct or erase your personal data, restrict its use or receive it in a portable format. You can object to processing based on our legitimate interests for reasons relating to your particular situation. Where we rely on consent, you can withdraw it at any time, with effect from that point.

Release Candidate

For data we control, email hello@rc-technologies.com to exercise your rights. We respond within one month of receiving your request and will let you know within that period if an extension is permitted and needed.

You may also complain to the data protection authority where you live or work, or where you believe an infringement occurred. In Cyprus, you can contact the Office of the Commissioner for Personal Data Protection at commissioner@dataprotection.gov.cy. How to lodge a complaint

**10. Updates to this policy**

We publish updates on this page and revise the version at the top when the policy changes.