

MULIUM CONSULTING LTD

Privacy Policy

Document	Website Privacy Policy
Data controller	Mulium Consulting Ltd (Reg. No. HE 360177)
Website	https://mulium.eu
Last updated	1 October 2026

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Introduction

This Privacy Policy explains how Mulium Consulting Ltd ("Mulium", "we", "us" or "our") collects, uses and protects personal data when you visit mulium.eu (the "Website") or contact us about our services. We process personal data in accordance with the EU General Data Protection Regulation (Regulation (EU) 2016/679, "GDPR") and the applicable data protection laws of the Republic of Cyprus.

1. Who we are

The data controller responsible for your personal data is:

Mulium Consulting Ltd

Company registration number: HE 360177 (Republic of Cyprus)

Registered office: 43 Griva Digeni, Floor 7, Office 9, 3096 Limassol, Cyprus

Email: info@mulium.eu

2. Personal data we collect

We only collect the personal data we need. This may include:

- **Contact information** you provide when you fill in our contact form or email us, such as your name, email address, and the content of your message.
- **Business relationship data** about contact persons at our clients, prospective clients, partners and suppliers, such as names, business contact details and correspondence.
- **Technical data** collected automatically when you visit the Website, such as your IP address, browser type and version, device and operating system, pages visited, date and time of access, and referring website. This data is recorded in standard server logs.

We do not intentionally collect special categories of personal data (for example, data about health, religion or political opinions). Please do not send us such data.

3. How we use your data and our legal bases

- **To respond to your enquiries** and communicate with you about our services – based on our legitimate interest in answering requests, or on steps taken at your request before entering into a contract (Art. 6(1)(f) and 6(1)(b) GDPR).
- **To provide our services and manage client relationships** – to perform a contract with you or your organisation (Art. 6(1)(b) GDPR) and our legitimate interest in running our business (Art. 6(1)(f) GDPR).
- **To operate, maintain and secure the Website**, prevent misuse and fix technical issues – based on our legitimate interest in a secure and functioning website (Art. 6(1)(f) GDPR).
- **To comply with legal obligations**, such as accounting, tax and regulatory requirements, or requests from competent authorities (Art. 6(1)(c) GDPR).
- **To establish, exercise or defend legal claims** – based on our legitimate interest (Art. 6(1)(f) GDPR).

Where we rely on your consent, you may withdraw it at any time by contacting us. Withdrawal does not affect the lawfulness of processing carried out before it.

We do not sell your personal data, and we do not use it for automated decision-making or profiling that has legal or similarly significant effects on you.

4. Is providing your data mandatory?

Providing personal data to us is voluntary. However, if you do not provide the information needed to handle your enquiry (for example, your email address), we may not be able to respond to you or provide our services.

5. Cookies and similar technologies

The Website uses only cookies and similar technologies that are strictly necessary for it to work properly and securely. These do not require your consent.

The Website may load fonts from Google Fonts. When this happens, your browser connects to Google's servers and your IP address may be transmitted to Google. For more information, see Google's Privacy Policy at policies.google.com/privacy.

If we introduce analytics, marketing or other non-essential cookies in the future, we will ask for your consent first and update this Policy accordingly. You can also control and delete cookies through your browser settings.

6. Who we share your data with

We share personal data only where necessary and with appropriate safeguards in place:

- **Service providers** acting on our behalf, such as website hosting, IT, email and cloud service providers. They may process data only on our instructions and under a data processing agreement.
- **Professional advisers**, such as lawyers, accountants and auditors, where required for our business.
- **Public authorities, courts and regulators**, where we are required to do so by law.
- **A buyer or successor** in the event of a merger, acquisition or sale of all or part of our business.

7. International data transfers

We aim to store and process personal data within the European Economic Area (EEA). If data is transferred outside the EEA, we make sure it is protected by appropriate safeguards, such as an adequacy decision of the European Commission or the European Commission's Standard Contractual Clauses. You can contact us for more information about these safeguards.

8. How long we keep your data

- **Enquiries and correspondence** that do not lead to a business relationship – up to 24 months after our last communication.
- **Client and contract-related data** – for the duration of the relationship and afterwards for as long as required by law (for example, tax and accounting rules) or needed to defend legal claims.
- **Server logs** – usually no longer than 90 days, unless needed to investigate a security incident.

When data is no longer needed, we delete or anonymise it securely.

9. How we protect your data

We use appropriate technical and organisational measures to protect personal data against unauthorised access, loss, misuse or alteration. These include encrypted connections (HTTPS), access controls and confidentiality obligations for our staff and service providers. However, no method of transmission over the internet is completely secure, and we cannot guarantee absolute security.

If a personal data breach occurs that is likely to result in a risk to your rights and freedoms, we will notify the competent supervisory authority and, where required, you, in accordance with the GDPR.

10. Your rights

Under the GDPR, you have the right to:

- **Access** the personal data we hold about you;
- **Rectify** inaccurate or incomplete data;
- **Erase** your data ("right to be forgotten"), where applicable;
- **Restrict** the processing of your data;
- **Object** to processing based on our legitimate interests;
- **Data portability** – receive your data in a structured, commonly used format;
- **Withdraw consent** at any time, where processing is based on consent.

To exercise any of these rights, email us at info@mulium.eu. We will respond within one month. We may ask you to verify your identity before acting on your request.

You also have the right to lodge a complaint with a supervisory authority. In Cyprus, this is:

Office of the Commissioner for Personal Data Protection

1 Iasonos Street, 1082 Nicosia, Cyprus

Website: www.dataprotection.gov.cy

You may also contact the supervisory authority in the EU country where you live or work.

11. Links to other websites

The Website may contain links to other websites, including the website of our ARES anti-fraud solution. We are not responsible for the privacy practices of other websites. Please read their privacy policies when you visit them.

12. Children

The Website and our services are intended for businesses and are not directed at children under 16. We do not knowingly collect personal data from children.

13. Changes to this Policy

We may update this Privacy Policy from time to time. The latest version will always be available on the Website, with the version number and date of the last update shown at the top.

14. Contact us

If you have any questions about this Privacy Policy or how we handle your personal data, please contact us:

Mulium Consulting Ltd

43 Griva Digeni, Floor 7, Office 9, 3096 Limassol, Cyprus

Email: info@mulium.eu