

ZIMEN LTD — PRIVACY & COOKIES POLICY

(Issued 12 October 2025 • www.elavareconsulting.com)

1 Controller

Zimen Ltd (HE 404722)
44 Orthodoxou Tower, Floor 3, 6042 Larnaca, Cyprus
Email: zimenlimited@gmail.com

Zimen Ltd (“we”, “us”, “our”) is the data controller responsible for personal information collected through this website and in connection with our real-estate development and related advisory activities.

2 Scope

This Policy explains how we collect, use, disclose, and protect personal data when:

- you visit www.elavareconsulting.com;
 - you contact us for information or cooperation related to property or development projects; or
 - we perform administrative and coordination support connected to our real-estate business.
-

3 Data We Collect

Category	Examples
Identity & Contact	name, email, telephone number, address
Business & Project Details	enquiry content, budget, requirements
Technical	IP address, browser type, cookies
Communication Records	emails, meeting notes

Billing Data

invoice recipient, bank details (IBAN confirmation only)

4 Purpose and Legal Basis

Purpose	Legal Basis
Responding to enquiries	Contract or pre-contract steps
Managing client files and invoices	Contract & legal obligation
Coordinating external professionals	Legitimate interest & contract
Website operation and security	Legitimate interest
Marketing updates (if opt-in)	Consent
Statutory obligations (e.g. tax records)	Legal obligation

5 Children

Our website and services are intended for adults. We do not knowingly process data of persons under 14 years old.

6 Recipients of Data

We may share data with:

- **Wix.com Ltd** (website hosting and forms)
- **Calendly Inc.** (scheduling meetings)
- email service providers
- authorised lawyers, accountants, or estate agents engaged by the client
- authorities only where legally required

All recipients operate under contractual data-protection obligations.

7 International Transfers

Where data is processed outside the EEA, Zimen Ltd applies **Standard Contractual Clauses (SCCs)** and other safeguards in line with Articles 44–49 GDPR.

8 Retention Periods

- Enquiries and leads – 24 months after last contact.
 - Client files – 7 years after project completion.
 - Cookie consent records – 13 months.
Data may be anonymised for statistical purposes after expiry.
-

9 Your Rights

You may request access, rectification, erasure, restriction, portability, or object to processing. Requests → **zimenlimited@gmail.com**

You also have the right to complain to the **Office of the Commissioner for Personal Data Protection (Cyprus)**.

10 Security Measures

We use TLS encryption, role-based access, and confidentiality agreements with staff and vendors. Although no system is entirely secure, we apply industry best practices.

11 Cookies and Tracking Technologies

11.1 What Cookies Are

Cookies are small files stored on your device to enable basic functions, preferences, and analytics.

11.2 Categories Used

Type	Purpose	Example Cookies	Retention
Essential	Website security & navigation	XSRF-TOKEN, svSession	Session / 12 mo

Functionality	Language or display preferences	wixLanguage	12 mo
Analytics	Performance statistics (Google Analytics 4)	_ga	13 mo
Marketing	Ad measurement (if enabled)	_fbp	3 mo

11.3 Consent Mechanism

Upon first visit, a banner appears allowing “Accept All”, “Reject Non-Essential”, or “Customise”.

Your choice is stored for 13 months and can be changed any time via “Manage Cookies”.

11.4 Third-Party Cookies

Some functionalities (Wix, Calendly, Google Analytics) may set their own cookies. These providers maintain their own privacy and data protection standards.

11.5 Managing Cookies

You can delete or block cookies in browser settings. Blocking essential cookies may impact site functionality.

12 Changes to This Policy

We may update this Policy periodically. The revision date at the top indicates the latest version. Material changes will be notified on the website.