

PRIVACY POLICY

UNO Cyprus · Reiwa Capital Ltd & Concept Branding BV T/A Propular

Effective Date: 1 June 2026 · Last Updated: 1 June 2026

Applies to: www.uno-cyprus.com and sales.uno-cyprus.com

INTRODUCTION

This Privacy Policy explains how personal data is collected, used, stored, and protected in connection with the marketing and sale of the UNO residential development in Paphos, Cyprus.

This website and the associated sales platform at sales.uno-cyprus.com are operated by Propular (trading name of Concept Branding BV, KVK 90875001, Amsterdam, Netherlands). Propular funds and manages the marketing campaign and digital infrastructure for UNO Cyprus.

Reiwa Capital Ltd is the property developer and the entity responsible for reservation, contract, and transaction processing in connection with the UNO development.

We comply with the General Data Protection Regulation (EU) 2016/679 (GDPR), applicable Cyprus data protection legislation, and the Dutch Uitvoeringswet AVG (UAVG).

DATA CONTROLLER STRUCTURE

Your personal data is processed by different controllers depending on the stage of your engagement with UNO Cyprus. Each party acts as an independent Data Controller for its own phase of processing.

Phase 1: Lead Generation & Qualification
Propular (Concept Branding BV) From first enquiry through to reservation. Propular determines the purposes and means of data collection, qualification, and marketing communication.
Phase 2: Reservation & Transaction
Reiwa Capital Ltd From reservation onwards. Reiwa assumes full control for contract execution, KYC/AML compliance, and transaction completion.

Phase 1 — Propular as Data Controller

Propular (Concept Branding BV, KVK 90875001) acts as Data Controller for all personal data collected via www.uno-cyprus.com, sales.uno-cyprus.com, and associated marketing campaigns prior to reservation. Propular independently determines how your data is collected, which systems it is held in, how it is used for qualification and marketing, and how long it is retained if you do not proceed to reservation.

Registered address: Rubensstraat 82-2, 1077 NA, Amsterdam, Netherlands.

Lead supervisory authority: Autoriteit Persoonsgegevens (Dutch Data Protection Authority) — www.autoriteitpersoonsgegevens.nl

Phase 2 — Reiwa Capital Ltd as Data Controller

Upon reservation of a UNO Cyprus unit, your personal data is transferred to Reiwa Capital Ltd, who becomes the Data Controller for all subsequent processing. From this point, Reiwa processes your data for reservation and contract management, KYC and AML compliance, payment processing, and all activities associated with the completion of your property purchase.

Reiwa Capital Ltd operates under its own privacy policy, which will be provided to you at the point of reservation. Propular's role in processing your data ceases upon handoff, except where retention of limited records is required for Propular's own legal or regulatory obligations.

WHAT PERSONAL DATA WE COLLECT

During Phase 1, Propular may collect and process the following:

Identity and contact data: full name, email address, phone number, nationality, and country of residence.

Inquiry and qualification data: property preferences, budget range, intended use (owner-occupier or investment), purchase timeline, and communication history.

Technical data: IP address, device type, browser type, operating system, and session data.

Marketing and engagement data: campaign source, page interactions, email open and click data, and consent preferences.

Upon reservation and transfer to Reiwa (Phase 2), the following additional categories apply:

Transaction data: reservation details, payment references, and purchase documentation.

KYC and AML data: identity verification documents and related information required by applicable law.

HOW WE COLLECT YOUR DATA

Lead generation and enquiry forms on www.uno-cyprus.com and associated landing pages.

Direct registration and activity on the sales platform at sales.uno-cyprus.com.

Email and telephone communications initiated by you.

Online advertising campaigns and referral sources, including paid social media campaigns operated by Propular.

Analytics and tracking technologies on our websites and platform.

LEGAL BASIS FOR PROCESSING

Phase 1 — Propular

Legitimate interests: for responding to enquiries, qualifying interest, facilitating the sales process, and improving marketing and platform performance, where these interests are not overridden by your rights.

Consent: where you have opted into direct marketing communications via a separate, explicit opt-in at the point of data collection.

Pre-contractual necessity: where processing is required to take steps at your request prior to entering into a reservation agreement.

Phase 2 — Reiwa Capital Ltd

Pre-contractual and contractual necessity: for execution of reservation and purchase agreements.

Legal obligation: to comply with applicable law, including AML and KYC obligations under Cyprus and EU law.

Legitimate interests: for ongoing client management and sales administration.

HOW WE USE YOUR DATA

Popular (Phase 1)

To contact you regarding UNO Cyprus, including availability, pricing, and the purchase process.
To qualify your interest and determine your suitability as a prospective buyer.
To send marketing communications where you have provided consent.
To monitor, analyse, and improve our marketing campaigns and sales platform.
To transfer your data to Reiwa Capital Ltd upon reservation.

Reiwa Capital Ltd (Phase 2)

To facilitate reservation, contract, and transaction processes.
To comply with AML, KYC, and applicable regulatory requirements.
To manage the client relationship through to transaction completion.

DATA HANDOFF AT RESERVATION

At the point of reservation, Popular transfers your personal data to Reiwa Capital Ltd under a Data Transfer Agreement that governs the conditions of transfer and ensures appropriate safeguards are in place.

Following this transfer:

Reiwa Capital Ltd becomes the Data Controller for all subsequent processing.
Reiwa's own Privacy Policy applies from that point forward.
Popular retains only the minimum data necessary to fulfil its own legal and regulatory obligations (for example, records of consent and marketing activity). This data is not used for any further marketing or commercial purpose.
You will be informed of the transfer at the point of reservation and provided with Reiwa's privacy information.

Popular does not sell, rent, or otherwise commercialise your personal data at any stage.

DATA SHARING

During Phase 1, Popular may share your data with:

Technology and service providers (CRM, email, advertising platforms, analytics, cloud infrastructure), all engaged under GDPR-compliant data processing agreements.
Reiwa Capital Ltd, upon reservation, as described above.
Professional advisors where necessary for legal or compliance purposes.
Regulatory and law enforcement authorities where required by law.

During Phase 2, Reiwa Capital Ltd may additionally share your data with legal, financial, and compliance advisors, and with regulatory authorities as required.

Neither Popular nor Reiwa sells your personal data to any third party.

ADVERTISING PLATFORMS AND THIRD-PARTY TRACKING

Propular operates paid digital advertising campaigns for UNO Cyprus, including on Meta platforms (Facebook and Instagram). These campaigns use tracking technologies including the Meta Pixel, which may collect data about your activity on our website and connect it with your Meta profile. Meta Ireland Ltd acts as an independent data controller for data collected through its advertising platform. For further information, see Meta's Privacy Policy at www.facebook.com/privacy/policy. You can manage your advertising preferences via your Meta account settings or through our cookie consent banner.

INTERNATIONAL DATA TRANSFERS

Your personal data may be transferred to and processed in countries outside the European Economic Area (EEA). Where such transfers occur, we ensure appropriate safeguards are in place, including Standard Contractual Clauses (SCCs) approved by the European Commission, or transfers to jurisdictions recognised as providing an adequate level of data protection.

DATA RETENTION

Propular retains personal data for the following periods:

Unconverted leads: up to 24 months from the date of last interaction, after which data is permanently deleted unless earlier deletion has been requested.

Marketing data: until consent is withdrawn, at which point removed from active systems within 30 days.
Records of data transfer to Reiwa: retained for the period necessary to demonstrate compliance.

Following transfer to Reiwa Capital Ltd, Reiwa's own retention schedules apply:

Clients and completed transactions: 6 to 10 years in accordance with applicable legal, tax, and regulatory requirements.

KYC and AML records: up to 5 years following the end of the business relationship.

YOUR RIGHTS

Under GDPR, you have the right to: access your data; rectification of inaccurate data; erasure where no legitimate basis for continued processing exists; restriction of processing; object to processing based on legitimate interests or for direct marketing; data portability; and withdrawal of consent at any time.

To exercise rights relating to Propular's processing (Phase 1): dale@propular.nl

To exercise rights relating to Reiwa's processing (Phase 2): contact Reiwa Capital Ltd directly.

We will respond to all requests within 30 days.

COOKIES AND TRACKING TECHNOLOGIES

We use cookies and similar tracking technologies on our sites to analyse performance, track campaign effectiveness, and improve user experience. Non-essential cookies — including analytics and advertising cookies — are not set until you have provided consent via the cookie banner on your first visit. You may update preferences or withdraw consent at any time.

A full Cookie Policy is available at www.uno-cyprus.com/cookie-policy.

DATA SECURITY

We implement appropriate technical and organisational security measures including encryption in transit and at rest, access controls, secure cloud infrastructure, and regular system monitoring. In the event of a personal data breach likely to result in a risk to your rights and freedoms, we will notify the relevant supervisory authority within 72 hours and affected individuals without undue delay.

THIRD-PARTY LINKS

Our websites may contain links to third-party sites. We are not responsible for their privacy practices. We encourage you to review the privacy policy of any third-party site you visit.

UPDATES TO THIS POLICY

This policy may be updated periodically. The latest version will always be published at www.uno-cyprus.com/privacy-policy and sales.uno-cyprus.com/privacy-policy. Registered platform users will be notified of material changes by email.

CONTACT AND COMPLAINTS

Propular (Phase 1 — Data Controller)

Data Protection Contact: Dale Owen

Email: dale@propular.nl

Address: Rubensstraat 82-2, 1077 NA, Amsterdam, Netherlands

Supervisory authorities:

Netherlands (Propular): Autoriteit Persoonsgegevens — www.autoriteitpersoonsgegevens.nl

Cyprus (property matters): Office of the Commissioner for Personal Data Protection —

www.dataprotection.gov.cy

Reiwa Capital Ltd (Phase 2 — Data Controller)

For all data protection matters arising from or after reservation, please contact Reiwa Capital Ltd directly.

Their contact details and privacy policy will be provided at the point of reservation.

MARKETING CONSENT

Where Propular relies on consent for direct marketing, consent is collected separately and explicitly — for example, via a clearly labelled opt-in checkbox on our enquiry forms. Submitting an enquiry does not in itself constitute consent to marketing communications. You may withdraw consent at any time by clicking unsubscribe in any communication or by contacting dale@propular.nl.

END OF POLICY