

# Privacy Policy

Version 1.1

## Who we are

Our website address is: <https://neverstonecapital.com/>. By using this website, you agree to the collection, storage, and use of your personal information as described in this Privacy Policy.

## Personal Data

Personal data is any information that identifies or can identify you. This can include your name, contact details, IP address, cookie identifiers, or other unique identifiers.

## Comments

When you leave a comment, we collect the information shown in the comment form, along with your IP address and browser user agent, to help detect spam.

## Media

If you upload images, avoid including embedded location data (EXIF GPS), as visitors may download and view this information.

## Collection and Usage of Information

You can browse our site without providing personal data. However, if you:

- Subscribe to newsletters,
  - Register or fill out contact forms, or
  - Interact with our site via cookies,
- we may collect:

- Name or organisation name
- Postal address
- Email address
- Telephone and fax numbers
- Social media profiles

We may also collect:

- Information you provide via our contact form: <https://neverstonecapital.com/contact-us/>
- Correspondence with us
- Information about your website visits: <https://neverstonecapital.com/>

We only collect the minimum information needed to fulfill your requests.

## Cookies

We use cookies to improve your experience:

- Comment cookies: Store your name, email, and website for one year.

- Login cookies: Check if your browser accepts cookies and store login and display preferences. Temporary cookie discarded on browser close; login lasts two days, screen preferences last one year, “Remember Me” lasts two weeks. Logout removes cookies.
- Post edit cookies: Store post ID for one day to track recently edited articles.  
You may disable cookies in your browser, but this may reduce website functionality.

## **Embedded Content from Other Websites**

Embedded content (e.g., videos, images and articles) from other websites behaves in the exact same way as if the visitor has visited the other website.

## **How We Share and Disclose Your Personal Information**

We may share your information with business partners and suppliers under confidentiality agreements.

We may disclose information:

- When required by law, regulation, or legal process
- For regulatory compliance
- When explicitly requested by you
- As otherwise described in this policy

We may transfer personal information outside the European Economic Area, and by providing your information you consent to such transfer, storage, and processing. We do not sell, rent, or share your personal information with third parties without your consent, except for publicly available information incorporated into search products.

## **Who We Share Your Data With**

If you request a password reset, your IP address may be included in the reset email. Other sharing is limited to trusted partners or legal/regulatory requirements.

## **How Long We Retain Your Data**

- Comments and metadata are kept indefinitely to recognize and approve follow-up comments.
- Registered users’ personal information is stored in profiles. Users can edit or delete data (except usernames); administrators can also manage this data.
- Personal data is stored electronically or on paper for as long as necessary to fulfill its purpose or as legally required.

## **Your Data Protection Rights**

You have the following rights:

- Access: Request copies of your personal data.
- Rectification: Correct incomplete or inaccurate data.
- Erasure / Right to be forgotten: Request deletion of your personal data. This is irreversible.
- Restrict processing: Limit how we process your data under certain conditions.
- Object to processing: Object to processing under certain conditions.
- Data portability: Request your data to be transferred to another organisation or directly to you.

To exercise these rights, contact: [info@neverstonecapital.com](mailto:info@neverstonecapital.com)

## **Where Your Data Is Sent**

Visitor comments may be checked through an automated spam detection service.

## **Amendments to Policy**

We may update this policy at any time by posting the revised version here. Your continued use of the website means you accept any changes.

## **How to Contact Us**

For questions, concerns, or to exercise your rights, email: [info@neverstonecapital.com](mailto:info@neverstonecapital.com)

If you wish to report a complaint or feel we haven't addressed your concern, you may contact the Cyprus Data Protection Commissioner.