FineCheck Privacy Policy

This Privacy Policy may have changed since you last reviewed them. This Privacy Policy was last updated in September 2025.

This Privacy Policy explains how **FineCheck** ("we", "us", "our") collects and processes your personal data when you use **finecheck.cy** (the "**Site**") and our related services for checking Cyprus traffic camera fines and redirecting to official payment channels.

1. Who We Are (Data Controller)

Controller: K.I.A.B INVESTMENT MANAGEMENT CONSULTING LTD, registered in the Republic of Cyprus under number HE 421805, with registered office at 28 Oktovriou 317A, KANIKA BUSINESS CENTER BLOCK B, Floor 1, Office 101, 3105, Limassol, Cyprus.

Contact: support@finecheck.cv

2. What We Do

FineCheck allows you to look up the status of traffic camera fines in Cyprus by querying official sources (e.g., the Government of Cyprus Speed Enforcement System and/or CyCameraSystem) using the data you provide (vehicle plate number and ID/ARC/Passport/Company Registration Number). For payments, we redirect you to JCCsmart, the official Cyprus payment gateway. We are not affiliated with the Government of Cyprus, Cyprus Police, or JCC Payment Systems Ltd.

Authorisation to act on your behalf. By submitting your vehicle plate number and ID/ARC/Passport/Company Registration Number (and, where applicable, opting into monitoring), you authorise FineCheck to perform the fine lookup on your behalf on official portals of the Government of Cyprus (including the Speed Enforcement System/CyCameraSystem) and to redirect you to JCCsmart for payment. We act strictly on your instruction and only for the purposes of the lookup/payment flow you initiate.

3. Personal Data We Process

We endeavour to minimise the data we process. Depending on how you use the Site, we may process:

- Lookup data you provide: vehicle plate number, ID/ARC/Passport/Company Registration Number. *Processed only to perform the lookup you request.*
- Monitoring and notifications data (optional): if you opt in, we store vehicle plate number and ID/ARC/Passport/Company Registration Number to run periodic re-checks for new/updated fines and send notifications (e.g., email/push). We also store your contact details (email and/or phone).

- Support data (if you contact us): name, email address, message details, and any attachments you send.
- Technical and usage data: IP address, device and browser data (user-agent), timestamps, pages requested, referral URLs, and basic diagnostics/logs.
- Payment metadata: if you proceed to pay via JCCsmart, we may receive limited transaction references (e.g., success/failure status, internal IDs). We do not process card details; those are handled by JCCsmart.
- Cookies/Analytics: see our Cookies Policy for details. We use Amplitude, Google Analytics and Adjust for aggregated/anonymous analytics when you consent; we configure these tools to avoid collecting directly identifying data.

4. Why We Process Your Data (Legal Bases)

We process personal data in the Republic of Cyprus in accordance with Regulation (EU) 2016/679 (GDPR) and Cyprus Law 125(I)/2018 (as amended). Our legal bases are:

- Legitimate interests (Art. 6(1)(f) GDPR): to perform a one-off fine lookup at your request; to maintain the security and integrity of our services; to prevent fraud and abuse; and to operate technical logs and privacy-preserving, aggregate performance metrics.
- Contract (Art. 6(1)(b) GDPR): to provide any paid features or services you
 request and to facilitate redirection to the payment provider (e.g.,
 JCCsmart) and exchange limited transaction status references necessary to
 complete your request.
- Consent (Art. 6(1)(a) GDPR): (i) for non-essential cookies/analytics (Amplitude, Google Analytics, Adjust) these are loaded only after your consent and are used solely for analytics purposes. We do not store or process any personal data (such as vehicle plate numbers or identification details) within these tools. You may withdraw your consent at any time by contacting support; withdrawal does not affect processing carried out before withdrawal.
- Legal obligations (Art. 6(1)(c) GDPR): to comply with applicable EU and Cyprus law, respond to lawful requests by public authorities, and meet accounting/tax record-keeping requirements.

5. How We Obtain Your Data

- Directly from you: when you enter vehicle plate number and ID/ARC/Passport/Company Registration Number for a lookup or contact us for support.
- Automatically: via cookies and server logs when you browse the Site.
- From third parties: limited payment notifications from JCCsmart; responses from official portals we query on your instruction.

6. Sharing and Disclosure

We only share data when necessary:

- Official portals (independent controllers): Government of Cyprus portals (e.g., Speed Enforcement System) and/or CyCameraSystem to retrieve your fine status based on your inputs.
- Payment provider (independent controller): JCCsmart for payments; they process your card and personal data under their own privacy policy.
- Service providers (processors): Hetzner Online GmbH hosting, compute and storage (EU/EEA). Your lookup/monitoring data is stored on Hetzner servers.
- Amplitude product analytics (runs only with your consent; configured to receive anonymised/aggregated events).
- Google Analytics web analytics (consent-based; IP anonymisation enabled; no user-ID without consent).
- Adjust attribution/analytics for our apps (if you use our mobile apps; consent-based).
- Legal/Compliance: regulators, law enforcement, courts, professional advisers where required.

7. International Transfers

We aim to store/process data within the EU/EEA (Hetzner). Some processors (e.g., Amplitude, Google, Adjust) may process data outside the EU/EEA. Where this occurs, we rely on appropriate safeguards such as the EU Standard Contractual Clauses (SCCs) and supplementary measures (e.g., encryption, IP anonymisation). We conduct transfer assessments where relevant.

8. Data Retention

Lookup inputs (vehicle plate number, ID/ARC/Passport/Company Registration Number): processed ephemerally to perform a one-off check, then not retained beyond the active session, except minimal transient caching strictly necessary for the request lifecycle.

Monitoring & notifications (opt-in): vehicle plate number,

ID/ARC/Passport/Company Registration Number and your contact details are stored until you disable monitoring or request deletion. We perform periodic re-checks at the frequency you choose.

Server logs & security events: retained for 60 days for security and troubleshooting, then deleted or anonymised.

Support correspondence: retained for up to 12 months after resolution.

Payment references: retained for 6 years where required for accounting/tax or legal obligations.

You may request deletion of your personal data at any time by contacting our support at support@finecheck.cy. We will honour valid requests subject to legal obligations.

9. Your Rights

You have the rights of access, rectification, erasure, restriction, portability, objection, and the right to withdraw consent at any time (for consent-based

processing). To exercise your rights, contact us at support@finecheck.cy. You may also request deletion of data used for monitoring/notifications, and we will stop monitoring upon your request.

10. Security

We use reasonable technical and organisational measures to protect personal data, including TLS encryption, access controls, role-based permissions, least-privilege access, logging/monitoring, and regular updates. No system is 100% secure, but we work to mitigate risks.

11. Children

Our services are not directed to children under 18. If you believe a child provided personal data, please contact us for removal.

12. Automated Decision-Making

We do not make decisions solely by automated means that produce legal or similarly significant effects on you within the meaning of GDPR Art. 22 and Cyprus Law 125(I)/2018. We may use automated tools for security, fraud-prevention, notifications and analytics, but these do not by themselves determine your access to our services.

13. Third-Party Links

Our Site may link to third-party sites (e.g., government portals, JCCsmart). We are not responsible for their privacy practices.

14. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, or legal requirements. When we update the policy, we will revise the "Last updated" at the top of this page. We encourage you to review this page regularly for any changes.

15. Contact Us

For questions or requests about this Policy or your data, email support@finecheck.cy.