

COSTAS P. DEMETRIADES LLC

Privacy Policy

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1. Introduction

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation (EU) 2016/679 (commonly known as the “GDPR”), which applies across the European Union and we are responsible as the controller of that personal information for the purposes of the GDPR. Our use of your personal data is subject to your instructions, the GDPR, other relevant Cyprus and EU legislation and our professional duty of confidentiality.

2. Key terms

It would be helpful to start by explaining some key terms used in this policy:

we, us, our	Costas P. Demetriades LLC, a Lawyers’ Limited Liability Company registered in the Republic of Cyprus, with company registration number HE260625 and registered office at Panteli Katelari 21, Libra House, 6th Floor, 1097 Nicosia, Cyprus. It is regulated by the Cyprus Bar Association (Record No.: 217).
personal information	Any information relating to an identified or identifiable individual.
special categories of personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, Genetic and biometric data. Data concerning health, sex life or sexual orientation.

3. The scope of this privacy policy

This privacy policy applies in the following circumstances:

- when we provide or we agree to provide legal services to actual and prospective clients;
- when you request information from us or provide information to us;
- when we process of personal information of individuals who could be (or could be the employees or staff of) transaction counterparties or rival bidders to, or litigants in legal proceedings involving, our actual or prospective clients
- when you visit our offices.

4. Personal information we collect about you

We may collect and use the following personal information about you:

- **Identity Data** which includes your first name and last name, title, date of birth and gender and information that enables us to check and verify your identity, such as your identity card or passport number.
- **Contact Data** which includes your email address, telephone number and fax number.
- **Background Data**, which to enable us to undertake background, credit or other financial checks on you.
- **Financial Data** which includes billing and bank account details, other data necessary for processing payments and fraud prevention, and your financial details so far as relevant to your instructions, for example the source of your funds if you are instructing on a purchase transaction
- **Transaction Data** which includes details about payments and services you have purchased from us.
- **Usage Data**, which includes information about your use of our website, and our local area networking facilities (including WiFi) and similar electronic services.
- **Information relating to the matter in which we are instructed to provide our legal advice or representation** (see below for more information).
- **Physical Access Data**, relating to details of your visits to our premises.

The information relating to the matter in which you we have been instructed to provide legal advice or representation, varies depending on the nature of the matter, and the particular circumstances of the matter. Such information includes:

- personal data relevant to any dispute, grievance, investigation, proceeding, or other legal advice we have been asked to provide;
- medical records, for example if we are acting in a personal injury claim;
- business information, including information provided in the course of the contractual or client relationship between you or your organisation and us;
- nationality and immigration status and information from related documents, such as passports or other identification, and immigration information, for example if we are instructed on an immigration matter;
- your employment records including, where relevant, records relating to sickness and attendance, performance, disciplinary, conduct and grievances (including relevant special category personal data), for example if we are instructed on a matter related to your employment or in which your employment records are relevant;
- if we represent you in a criminal case, we will collect information about the alleged offences and any related criminal history;
- details of your spouse/partner and dependants or other family members, for example if you instruct us on a family matter or a will.

The above list is non-exhaustive. For more information on the categories of personal information we might collect and process about you, please contact us (see '**How to contact us**' below).

This personal information is required to enable us to provide our service to you or your organisation or we may need to collect this by law. If you do not provide personal information we ask for, it may delay or prevent us from providing services to you. In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

Several categories of the personal information we collect and use in the course of our client services and which relate to you, are considered special categories of personal information.

Where we process special categories of personal information in the course of our client and other similar services, we do so to assist you or your organisation to establish, exercise or defend legal claims or to assist you or your organisation in fulfilling the rights and obligations of applicable employment laws. In some cases, we will collect information about your criminal convictions and offences for legal or regulatory purposes (for example where required pursuant to anti-money laundering laws).

Our services are neither aimed at nor intended for children. However, we may process children's personal information when we act for you in relation to certain private matters (for instance, when we are advising you regarding a family law or probate matter). We process such personal data only where necessary for the specific client services we are providing. In such cases, we act on behalf of the parent or guardian. If the specific client service for which we need children's personal data is not entirely clear, please contact your relationship partner, who will be able to explain further.

5. How your personal information is collected

We collect most of this personal information directly from you—in person, by telephone, fax or email.

However, we may also collect information:

- from publicly accessible sources, for example:
 - the Registrar of Companies,
 - the Department of Lands and Surveys.
- directly from third parties, for example:
 - sanctions screening providers,
 - credit reference agencies,
 - client due diligence providers.
- from a third party with your consent, for example:
 - your bank or advisor,
 - consultants and other professionals we may engage in relation to your matter,
 - your employer or organisation,
 - your doctors, medical and occupational health professionals,
 - your insurers.

- via our IT systems for example:
 - case management and document management systems;
 - door entry systems and CCTV,

6. How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party, where your interests and fundamental rights do not override our interests or those of a third party; or
- where you have given your consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and the legal bases which we rely on to do so:

What we use your personal information for	Type of information	Lawful basis for processing
To provide legal services to you or your organisation	a) Identity Data b) Contact Data c) Financial Data d) Background Data e) Information relating to the matter in which we are instructed to provide our legal advice or representation	a) Performance of a contract with you or taking steps at your request before entering into a contract b) Necessary for our legitimate interests (ensuring that you are provided with the best services we can offer, record and administer our transactions) c) Necessary to comply with our legal and regulatory obligations
If you are our (actual or prospective) client, or could be a transaction counterparty or rival bidder to, or a litigant in	a) Identity Data b) Contact Data c) Financial Data	a) Performance of a contract or to taking steps at your request before entering into a contract

<p>proceedings involving our (actual or prospective) client, to check whether we would have a conflict of interest in acting for such client</p>	<p>d) Background Data e) Information relating to the matter in which we are instructed to provide our legal advice or representation</p>	<p>b) Necessary to comply with our legal or regulatory obligations c) Necessary for our legitimate interests (ensuring we and all other parties concerned understand any conflict of interest which may arise for us in a matter)</p>
<p>To take you on as a client or to open a new matter for you, including:</p> <p>a) conducting checks to identify our clients and verify their identity b) performing anti-money laundering, fraud and other background checks</p>	<p>a) Identity Data b) Contact Data c) Financial Data d) Background Data e) Information relating to the matter in which we are instructed to provide our legal advice or representation</p>	<p>a) Performance of a contract or taking steps at your request before entering into a contract b) Necessary to comply with our legal or regulatory obligations c) Necessary for our legitimate interests (ensuring we do not deal with proceeds of criminal activities or assist in any other unlawful or fraudulent activities for example terrorism,</p>
<p>To manage payments, fees and charges, and to collect and recover money owed to us</p>	<p>a) Identity Data b) Contact Data c) Financial Data d) Transaction Data</p>	<p>a) Performance of a contract b) Necessary for our legitimate interests (for running, administering and protecting our business and our rights</p>
<p>To verify the source of any funding or funds in a matter we are acting on</p>	<p>a) Identity Data b) Contact Data c) Financial Data d) Transaction Data</p>	<p>a) Performance of a contract b) Necessary to comply with our legal and regulatory obligations</p>

<p>To manage our relationship with you or your organisation which will include:</p> <ul style="list-style-type: none"> a) notifying you about changes to how we operate our business or our terms of business deal with you b) updating the information we have about you 	<ul style="list-style-type: none"> a) Identity Data b) Contact Data 	<ul style="list-style-type: none"> a) Performance of a contract with you or to taking steps at your request before entering into a contract b) Necessary to comply with our legal and regulatory obligations c) Necessary for our legitimate interests (to inform you about our business and keep our records updated)
<p>To run, administer and protect our business which will include:</p> <ul style="list-style-type: none"> a) ensuring business policies are adhered to b) operational reasons, such as improving efficiency, training and quality control c) preventing and detecting fraud d) preventing unauthorised access and modifications to systems e) ensuring safe working practices, staff administration and assessments f) ensuring the security of our premises, and detecting and preventing unauthorised access 	<ul style="list-style-type: none"> a) Identity Data b) Contact Data c) Financial Data d) Transaction Data e) Usage data f) Physical Access Data 	<ul style="list-style-type: none"> a) Necessary for our legitimate interests (for running, administering and protecting our business, monitoring and improving our business, making sure we are following our own internal procedures and working efficiently, preventing and detecting fraud and unauthorised access and modifications to systems) b) Necessary to comply with our legal and regulatory obligations

<p>to our premises and restricted areas</p> <p>g) to improve our website and services, and client relationships</p>		
<p>Gathering and providing information and making filings required by law or relating to audits, enquiries or investigations by regulatory bodies or authorities</p>	<p>a) Identity Data b) Contact Data c) Financial Data d) Transaction Data</p>	<p>a) Necessary to comply with our legal and regulatory obligations</p> <p>b) Necessary for our legitimate interests (for protecting our rights and defending ourselves in the context of audits, enquiries or investigations administration)</p>

External audits and quality checks	a) Identity Data b) Contact Data c) Financial Data d) Transaction Data	a) Necessary to comply with our legal and regulatory obligations b) Necessary for our legitimate interests (for maintaining our accreditations and operating at the highest standards)
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We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7. Who we share your personal information with

We routinely share personal information with:

- professional advisers who we instruct on your behalf or refer you to, for example medical practitioners, accountants or other experts;
- other third parties where necessary to carry out your instructions, for example your bank, the land registry in the case of a property transaction, the Registrar of Companies;
- our professional advisers or consultants, including bankers, auditors, accountants and insurers providing consultancy, legal, banking, audit, accounting or insurance services to us;
- service providers who provide information technology and system administration services to us;
- external auditors, any person or entity to whom we are required or requested to make such disclosure by any court of competent jurisdiction or by any governmental, taxation or other regulatory authority, law enforcement agency or similar body; and
- our insurers and banks.

We only allow third parties to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide services to us and to you.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a restructuring. Usually,

information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

8. Where your personal information is held

Information is usually held at our offices. However, it may also be held by third party agencies, service providers, representatives and agents as described above (see above: '**Who we share your personal information with**').

9. How long your personal information will be kept

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for. This includes for example the purposes of satisfying any legal, regulatory, accounting, reporting requirements, to carry out legal work, for the establishment or defence of legal claims.

Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you in accordance with the law; and
- to keep records required by law.

Different retention periods apply for different types of personal information. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. When it is no longer necessary to retain your personal information, we will delete or anonymise it.

10. Transferring your personal information out of the EEA

We will most likely not transfer your personal information outside the European Economic Area (**EEA**). However, it could in the future be necessary for us to share your personal information with any service providers located outside the EEA or if there is an international dimension to the services we are providing.

If so, such transfers will be subject to special rules under European and Cyprus data protection law.

If we do transfer your personal information out of the EEA, we will ensure a degree of protection similar to that afforded in EEA countries is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the European Commission.
- Where we transfer your personal information to countries that have not been deemed to provide an adequate level of protection for personal information by

the European Commission, we may use specific contracts approved by the European Commission which give personal information the same protection it has in Europe.

- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal information shared between the Europe and the US.

If you would like further information please contact us (see 'How to contact us' below).

11. Your rights

You have the following rights in relation to your personal information:

Access	The right to be provided with a copy of your personal information.
Rectification	The right to require us to correct any mistakes in your personal information. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.
To be forgotten	The right to require us to delete your personal information (in certain circumstances). This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
Restriction of processing	The right to require us to restrict processing of your personal information (in certain circumstances). This enables you to ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the information's accuracy; (b) where our use of the information is unlawful but you do not want us to erase it; (c) where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable

	format and/or transmit that data to a third party. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
To object	The right to object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.
Withdraw consent	The right to withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

For further information on each of those rights, including the circumstances in which they apply, please contact us or visit the website of the Commissioner for the Protection of Personal Data (www.dataprotection.gov.cy).

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: ‘**How to contact us**’;
- let us have enough information to identify you;
- let us have proof of your identity; and
- let us know what right you want to exercise and the information to which your request relates.

You will not have to pay a fee to access your personal information or to exercise any of the other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

12. Keeping your personal information secure

We have appropriate security measures to prevent personal information from being accidentally lost or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

13. How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The GDPR also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in Cyprus is the Commissioner for Personal Data Protection who can be contacted at 1 Iasonos street, 2nd floor, 1082 Nicosia; tel: 22818456; fax: 22304565; email: commissioner@dataprotection.gov.cy; www.dataprotection.gov.cy.

14. Changes to this privacy policy

This privacy policy was published on 15 July 2021.

We may change this privacy policy from time to time. When we do we will post the updated privacy policy on our website and we will also inform you via email if you are on our mailing list.

15. How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Panteli Katelari 21,

Libra House, 6th Floor, 1097 Nicosia, Cyprus

Email: p.demetriades@demetriadesllc.com Tel: +35722666436