

HARRIS  KYRIAKIDES

Privacy Notice

(in accordance with Article 13)

Harris Kyriakides LLC (which includes its affiliate companies and is referred to as *we, us, our, HKLLC* or *Company*) is committed to protecting your privacy and handling your data in an open and transparent manner. This Privacy Notice (the *Notice*) aims to inform and assure you that Harris Kyriakides LLC handles your personal information with respect to your personality and your rights and in accordance with Regulation (2016/679 (EU) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the *Regulation*).

This Notice is addressed to all natural persons who already maintain a business relationship with our Company or wish to contract with us or to establish a business relationship i.e Clients of the Company, Directors, Shareholders and Secretaries of legal entities, authorised signatories, management committee and/or members of another legal entity and/or natural persons who have a business relationship with the Company.

Personal data means any information about you that could identify you directly or indirectly, such as your name, ID number, phone number, address or email address.

Processing means any operation or set of operations which is performed on personal data, by automated means or otherwise, including collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

We ask you to read this Privacy Notice carefully as it contains important information on who we are, how and why we collect, store, use and share your personal information, your rights in relation to your personal information and on how to contact us and the supervisory authorities in the event that you have a complaint.

1. Who we are

Harris Kyriakides LLC is a leading law firm in Cyprus (Reg. Number: HE224161). As a full-service law firm, we offer full-range commercial legal services. The firm operates on a departmental basis and provides services regarding legal, financial and taxation issues. It also includes affiliate companies which provide ancillary services, such as administrative services, consultancy, translations and other services.

Harris Kyriakides LLC will be acting as the data controller responsible for your personal information processed. You can contact through the following methods:

Address: 115 Faneromenis Avenue, Antouanettas Building

6031 Larnaca

Tel.: +357 24 201600

Fax: +357 24 201601

Email: info@harriskyriakides.law

Harris Kyriakides LLC will also be responsible and shall be acting as a Controller in relation to all of its affiliated entities.

If you have any questions, or want more details about how we use your personal information, you can contact our Data Protection Officer at:

115 Faneromenis Avenue, Antouanettas Building

6031 Larnaca

Tel.: +357 24 201600

Fax: +357 24 201601

Email: dpo@harriskyriakides.law

2. Our sources of collecting personal data and the personal data we process

We may collect personal information from you in the course of our business, including through your use of our website, when you contact or request information from us, when you engage our legal or other services, when you register to attend our events and seminars or as a result of your relationship with one or more of our staff or clients. We also get your personal data from your organisation or persons associated with you and your affairs. Your information may also be received from employees of companies affiliated with HKLLC.

We may also collect and process personal data from databases and/or sources that are publicly accessible, such as the Land Registry, the Registrar of Companies and the Official Receiver, the press and the Media and companies that introduce you to us. We process data that we collect lawfully and only those that we are permitted to process.

Information we collect

The personal data we collect from our clients or prospective clients mainly include the following: Name, Surname, Date, City and Country of Birth, Identity/Passport Number, address (including proof of address, such as utility bill), Contact Details, such as Phone number and Email address, Bank account details, income, source of income, proof of funds, bank reference, shareholders statement, information about your marital status (including marriage certificate), information about your kids (including their birth certificates), your family tree, criminal record, CV, profession, your nationality and country of residence.

Please note that the data we collect vary depending on the services that we are required to provide.

3. The purpose for processing your personal data and the legal ground of this processing

We collect and process personal data in full compliance with the provisions of the Regulation as well as the national legislation.

We will only use your personal data 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.

In the paragraph below (3.1 to 3.4) there is a more detailed analysis of the purposes and the legal ground of the processing.

3.1 For the performance of a contract (Article 6 (1) (b))

The processing of personal data is necessary in order for us to be able to provide our services to you in accordance with our contract and/or to fulfill your orders and/or to provide you with related services. Moreover, we might need to process your personal data when examining your case or during the negotiations before signing an engagement letter.

The purposes of the processing are adjusted according to the nature of the service provided. (See above)

3.2 For the purposes of the legitimate interests pursued by us or by a third party (Article 6 (1) (f))

Except from the case above, either we or third parties, process your personal data when necessary, unless your fundamental rights and freedoms override the above interests. Please find below some examples:

- 3.2.1 in the public and/or market research in general, if you have not exercised the right to object;
- 3.2.2 in court proceedings and/or to claim our legal claims;
- 3.2.3 in the context of the operation and security of the IT sector of the company;
- 3.2.4 in the context of preventing and clarifying criminal offenses;
- 3.2.5 for the purpose of improving our services and products;
- 3.2.6 to notify you of changes to this policy and changes to any applicable terms and conditions we have a legitimate interest in doing so to maintain our relationship;
- 3.2.7 to keep our records updated.

It is noted that the CCTV system established in our premises aims at providing a safe and secure environment for our employees and clients and the smooth operation of our company.

3.3 Due to your consent (Article 6 (1) (a))

If you give your consent on the processing of your personal data for specific purposes, such as for receiving our newsletter, the legal ground for the processing of your personal data is your express consent.

Please note that you may at any time withdraw your consent. The validity of this revocation will concern the future. Furthermore, it should be noted that the above also applies if you gave us your consent before 25 May 2018.

3.4 For compliance with a legal obligation (Article 6 (1) (e))

The Company is subject to various legal obligations, such as the obligations arising from the Prevention and suppression of money Laundering and terrorist financing Law of 2007 (Law 188(I)/2007), the Income Tax Law 2002 (Law 118(I)/2002) and the tax legislation in general.

The legal obligations vary according to the services we provide to you or your status.

4. Who we share your data with

Within the Company

In the course of the Company's operation, the employees responsible for the performance of our contractual and legal obligations receive the necessary data.

Moreover, we might share your personal data with HKLLC affiliated companies in order to fulfill your orders such as for translations.

Outside the Company

Under Article 28 of the Regulation, we have the right to designate a processor. In such a case, it is likely that the processor will receive your personal data for the above purposes. For example, we might designate as processors IT companies and Cloud Providers, consultancy companies such as accountants, as well as companies providing organisation and filing services.

Furthermore, the company is legally obliged to transfer your personal data to various government authorities and/or services, such as the District Office, the Tax Office and VAT Services, the Department of Lands and Surveys, auditors, the Registrar of Companies, Town Halls or City Halls, the Department of Civil Registry and Migration, the Unit for Combating Money Laundering, Banks or Courts of the Republic of Cyprus and arbitrators.

It is possible that we share your personal data with other people/companies/organisations after you have provided us with your express consent for such transfer.

5. How long will your personal data be kept for

For existing clients

We will hold your personal data during our contractual relationship, including the pre-contractual negotiations stage. All information which relates to one of your matters will be stored in a file dedicated to that matter. We take reasonable steps to ensure that any papers are scanned and stored in the electronic file, then where appropriate they are shredded and disposed of securely or otherwise they are kept locked. After the termination of our contractual relationship, we will hold your personal data for up to 6 years, or the period required by the applicable Taxation law, or according to the relevant directive of the Commissioner of Personal Data.

Personal data we have obtained solely for the purpose of complying with money-laundering and terrorism-financing laws will be kept in accordance with those laws.

After the expiry of the retention period, we may dispose off your matter files (including your Personal Information) without further notice to you, except for any documents or deeds that we have agreed in writing to hold for safe keeping. Please note that the above period might be extended if for legal or technical reasons we cannot delete the above information.

We will keep any relevant documents prepared by HKLLC during the service for our records but these documents shall be anonymized.

For potential clients

We will hold your Personal Data during our negotiations prior to the conclusion of the contract, to the extent that it is necessary. In case of rejection of your application or withdrawal of your application, we will hold your Personal Data for 6 months, or according to the relevant directive of the Commissioner of Personal Data and/or other applicable law.

6. Transfer of your personal data outside the EEA or to an international organisation

We do not transfer your personal data outside the EEA or to any international organisation.

7. Keeping your personal data secure

We have in place all the appropriate security measures to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to have access to it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. Please inform us if your personal data changes during our relationship.

Our matter files are backed-up to a secure central server.

We take reasonable precautions to reduce the risk of hackers gaining access to our computers.

Our offices are kept locked whenever they are unattended.

Our staff receive regular data protection training.

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

8. Your rights

You have a number of important rights, under the Regulation. Specifically:

- 8.1 **right to access your personal data** (Article 15): meaning you might receive information and /or copy of the personal information we hold free of charge.
- 8.2 **right to rectification** (Article 16): you might ask us to correct any mistakes in your information which we hold.
- 8.3 **right to erasure** (“right to be forgotten”) (Article 17): you might ask us to erase the personal information concerning you.

However, we reserve the right to deny the erasure, if the processing is necessary for compliance with a legal obligation, for reasons of public interests or for the establishment, exercise or defense of legal claims.

- 8.4 **right to restriction of processing** (Article 18): you might require us to restrict our processing of your personal data if you contest the accuracy of your personal data, the lawfulness of the processing, or you have objected to processing (according to article 21, see below) and you wait for our reply whether we have legitimate grounds which override yours.
- 8.5 **right to data portability** (Article 20): you have the right to request and receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit this data to a third party under certain circumstances.
- 8.6 **right to object** (Article 21): you have the right to object at any time to processing of personal data concerning you which is based on performance of a task carried out in the public interest or for the purposes of the legitimate interest pursued by us or third parties (article 6 (1) (e) and (f) of the Regulation).

You also have the right to object, at any time, to the processing of personal information for direct marketing or decisions being taken by automated means, which cause legal effects concerning you or similarly significantly affect you.

In case you exercise this right, we shall no longer process your personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claim.

- 8.7 **right to withdraw your consent**: you reserve the right to withdraw your consent at any time. However, the withdrawal of the consent does not affect the lawfulness of the processing based on consent before its withdrawal.

If you wish to exercise any of the above rights or to ask any questions or clarifications, please do not hesitate to contact our Data Protection Officer at:

Address: 115 Faneromenis Avenue, Antouanettas Building, 6031 Larnaca

Tel.: +357 24 201600

Fax: +357 24 201601

Email: dpo@harriskyriakides.law

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

- email or write to us or our Data Protection Officer
- let us have enough information to identify you
- let us have proof of your identity and address
- let us know the information to which your request relates.

Please note that if you would like to unsubscribe from any email newsletter you can also click on the 'unsubscribe' button at the end of the email newsletter. It may take up to five days for this to take place.

9. How to complain

We hope that our Company and specifically the Data Protection Officer can resolve any query or concern you raise about our use of your information.

However, the Regulation also gives you right to lodge a complaint with the supervisory authority, the Commissioner of Personal Data Protection. For more information concerning the process of filing a complain please visit the website www.dataprotection.gov.cy/ or contact the commissioner via e-mail at commissioner@dataprotection.gov.cy.

10. Are you obliged to provide us with your personal data?

You are required to provide your personal data to the extent that it is necessary to conclude, perform or terminate the contract between us and to fulfill your mandates.

Furthermore, under the applicable anti-money laundering law we have to obtain and hold satisfactory evidence of the identity of our clients and sometimes of related persons (including shareholders, beneficial owners, management, directors and officers) such as your/their passport/ID, proof of address and sources of wealth. Sometimes we will need to: (a) see original documents; (b) check the information you provide; (c) use your personal information to check your identity and background through electronic data sources; and (d) ask you for up-to-date evidence of identity.

If you do not provide us with this personal information, or if it is not satisfactory, we may not be able to act, or to continue to act, for you.

We are also required to report to the regulatory authorities suspicions of money laundering and terrorist financing. This will involve the processing of sensitive information where applicable, such as details of criminal allegations and/or findings, regulatory action, and related proceedings which are reported in the press and electronic/other data sources.

In case you refuse to give us your personal data, we will not be able to provide our services to you.

11. Automated individual decision-making

As a rule, we do not make automated decisions. If we make use of automated decision-making, you will be properly informed if this is necessary on the basis of the relevant legislation.

12. Is your data used for profiling?

'Profiling' means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, personal preferences, interests, reliability, behaviour, location or movements.

Your personal data shall not be used for profiling.

13. Changes in this privacy notice

This Privacy Notice was published on 1 May 2018 and last updated on 10 September 2018.

We may modify or amend this privacy statement from time to time. We will notify you appropriately when we make changes to this privacy statement and we will amend the revision date at the top of this page. We do however encourage you to review this statement periodically so as to be always informed about how we are processing and protecting your personal information.

Please contact us or our Data Protection Officer, if you have any questions about this privacy notice or the information we hold about you at dpo@harriskyriakides.law.

Larnaca (Head Offices)

115 Faneromenis Avenue
Antouanettas Building
6031 Larnaca, Cyprus

Nicosia

1 Kinyra Street
5th Floor
1102 Nicosia, Cyprus

Limassol

41 Misiaouli & Kavazoglou
2nd Floor
3016 Limassol, Cyprus

Paphos

10 Nicolaos Nicolaidis
1st Floor
8010 Paphos, Cyprus

Tel.: +357 2420 1600

Fax: +357 2420 1601

Email: info@harriskyriakides.law

Web.: <http://www.harriskyriakides.law>