

PRIVACY POLICY

Last update: October 2024

1. WHO WE ARE - CONTROLLER(S)

The present (“**this Privacy Policy**”) is issued by L Papaphilippou & Co LLC (HE 300557, a law firm), L Papaphilippou & Co (Σ 4478, partnership), L Papaphilippou & Co Limited (HE 221413, holding company) and each and every one of their affiliated companies, which respectively offer secretarial and/or administration and/or trustee and/or protector services. These legal entities are separately constituted and regulated in the Republic of Cyprus.

Kindly note that the particular Company (or Companies) responsible for Processing your Personal Data as Controller(s) depend on which Company you contact and the services that you (or the natural or legal person associated with you) receive by or provide to us, as specified in the course of the contractual and/or business relationship (e.g. in the relevant engagement letters or other agreements, documentation and correspondence generated and/or exchanged).

Depending on the service provided, a Company may act as a Processor or sub-Processor on behalf of a client, whereupon such a Company will Process Personal Data only on the instructions of the relevant client / Controller (unless otherwise legally required) and in accordance with the Data Protection Laws.

Words such as “**we**”, “**us**”, “**our**”, or “**the Companies**” are used herein to refer to each Company issuing this Privacy Policy as a Controller.

2. PURPOSE AND SCOPE OF THIS PRIVACY POLICY

We understand the implications that the use, storage and disclosure of Personal Information may have for the individuals concerned. We are committed to protecting the privacy of individuals and the confidentiality of the information concerning them, and to treating any Personal Information in accordance with the Data Protection Laws.

This Privacy Policy is directed to:

- Individuals who are our clients (clients-on-record)
- Individuals who are associated with our (prospective or current or former) clients, associates, suppliers and service providers;
- Individuals who are interested in a job position with us, or for our Summer Internship Programme or Trainee Advocates Programme;
- Visitors to our premises or the Website and other online media;
- Any other individuals communicating or interacting with us in the course of our business.

References to “**you**” are used in this Privacy Policy to refer to any individual within its scope.

This Privacy Policy provides an overview of how and why we collect, use, store, disclose and protect Personal Data, as Controllers, in the course of our respective business activities, and outlines the rights of any individuals concerned under the Data Protection Laws. It supplements any other notices that may be issued on particular instances and it is not meant to override them.

Please read the following carefully in order to understand our policies and practices regarding your Personal Information and how we Process it.

3. DEFINITIONS AND LEGAL REFERENCES

“**Controller**” means the organization or the individual that determines the purpose(s) and means of Processing Personal Data. In essence, a Controller is the person that exercises control and is responsible for the collection, use and keeping of Personal Data.

“**Data Protection Laws**” means all laws and regulations applicable to the Processing of Personal Data, including the Law on the Protection of Natural Persons Against Personal Data Processing and the Free Movement of Such Data of 2018 (L. 125(I)/2018) and the General Data Protection Regulation 2016/679 (the GDPR), as they are amended from time to time.

“**Personal Data**”, “**Data**” and “**Personal Information**” refer to any information relating to a living individual, which identifies or may identify him/her, either directly or indirectly from that information in combination with other information. Information that has been irreversibly rendered anonymous in such a way that the individual is not (or no longer is) identifiable, is not considered to be Personal Data.

“**Processing**” or “**Process**” collectively refers to any actions or set of actions performed upon Personal Data, such as the collection, recording, retention, structuring, storage, use, disclosure, adaptation or alteration, transfer, deletion or destruction of Personal Data.

“**Processor**” means the entity and/or individual that Processes Personal Data on behalf of a Controller. A “**Sub-processor**” is a third party Processor engaged by the original Processor or any further Sub-processors that Process Personal Data on the behalf of a Controller.

“**Special Category Data**” means Personal Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic and/or biometric Data Processed for the purpose of uniquely identifying a natural person, information concerning health or a natural person’s sex life or sexual orientation.

“**Website**” means the L Papaphilippou & Co LLC website (www.papaphilippou.eu).

For an explanation of the terms used in this Privacy Policy to describe the legal justification of handling Personal Data, please see section 4 below.

4. EXPLANATION OF LEGAL JUSTIFICATIONS FOR PERSONAL DATA PROCESSING

We only Process Personal Information where we have a legal justification to do so, in accordance with the Data Protection Laws. We mostly rely on the following legal grounds:

- **Contract**

We will process your Personal Data in order to perform a contract to which you are a party, or to take steps, at your request, prior to you entering into a contract with us.

- **Legal Obligations**

We may process your Personal Data in order to meet our legal or regulatory obligations, for example to comply with a duty we are subject to as provider of regulated services or because of a

legal or regulatory obligation of general application, and where we are legally required to provide your Personal Data to a court of law, the police, the Cyprus Bar Association or other governmental or public authority on specific instances.

- **Public Interest**

Where Processing is necessary for the performance of a task carried out in the public interest (e.g. for Anti-Money Laundering and anti-terrorism financing purposes).

- **Consent**

We may rely on your consent for certain actions that involve the collection and use of your Personal Data. In such an event, we will only perform such actions provided that you grant us your prior consent and authorisation to do so.

- **Legitimate Interests**

We may process your Personal Data where it is necessary for safeguarding and pursuing our own legitimate interests or those of others, based on our evaluation that the Processing is fair, reasonable and balanced, having taken into account your reasonable expectations.

Personal Data are Processed under this ground for reasons such as those specified in this Privacy Policy, below. Additionally, such Processing may be necessary for purposes such as entering into or performing an agreement to which you are not a party (e.g. where you are not our client on record but you are involved in the relevant transaction or court or other proceedings); for ensuring the smooth operation of our network and IT operations and security; for IP rights protection; to implement measures and processes for the prevention of theft and other offences; for professional insurance coverage; for establishing, pursuing and/or defending claims in judicial or regulatory or administrative or out-of-court proceedings; for taking measures in respect of an actual or potential restructuring, joint venture, sale, transfer, assignment, merger and acquisition, financing of or investment in, part of or all of our business or assets or any associated rights or interests; and for the prevention and investigation of unlawful and fraudulent activities.

5. OVERVIEW OF OUR MAIN DATA PROCESSING OPERATIONS

As a matter of principle, we only collect, use and otherwise Process Personal Information where and to the extent necessary in relation to the specified purpose pursued.

An overview of our main Data Processing operations is provided below. Kindly note that the following list constitutes an indicative, non-exhaustive, presentation of the main Data Processing operations we perform. The exact Data Processing operations we carry out depend on factors such as the particular Company Processing your Data, the nature of the Company's business relationship with you (or the legal entity or individual you are associated with) and the services offered and/or provided.

PURPOSE - ACTIVITY	EXAMPLES OF DATA	LEGAL JUSTIFICATION
<p>Checking whether there is a conflict of interests to act for a prospective client (or for a current client on a different matter)</p>	<ul style="list-style-type: none"> • Identity Data -In case of clients and/or other parties involved who are individuals, Data such as names and ID/passport numbers; -In case of clients and/or other parties involved who are legal entities, names of directors, secretaries, shareholders/UBOs. • Services Data (e.g. information regarding the services requested and/or history of services rendered); 	<ul style="list-style-type: none"> • Contract; • Legal obligation; • Legitimate interests: -To ensure that we are aware of any conflict of interest that may arise for us and to manage business relationships and any risks;
<p>To perform compliance checks (including performing anti-money laundering, anti-terrorism, sanction screening, Politically Exposed Persons (PEPs), fraud and other background checks)</p>	<ul style="list-style-type: none"> • Identity Data (e.g. names, date of birth, copies of ID/passports); • Contact Details (e.g. telephone numbers, residential, business and postal addresses, email addresses) • Financial Data (e.g. source of capital, assets, income); • Professional and/or business information (e.g. business association, job position and professional history, current and past business activities, CVs); • Sensitive Data (including Data relating to criminal convictions and offences) 	<ul style="list-style-type: none"> • Contract; • Legal obligation; • Public interest;
<p>Managing payments, fees and charges (incl. collecting and/or paying funds; verifying the source of funds)</p>	<ul style="list-style-type: none"> • Identity Data (e.g. names, ID/passport numbers); • Contact Data (e.g. email addresses, telephone numbers; postal addresses); 	<ul style="list-style-type: none"> • Contract; • Legal obligation; • Public interest;

	<ul style="list-style-type: none"> • Services Data (e.g. information regarding the services connected to the financial transactions); • Financial Data (e.g. bank account numbers and other data relating to payments; tax data; information regarding source of funds); 	
Provision of services and managing contractual and/or business relationships (including exchanging information with the client regarding the progress of the provision of the relevant services and notification about any material changes)	<ul style="list-style-type: none"> • Identity Data (e.g. names); • Professional Details (e.g. business association and professional position) • Contact Data (e.g. email addresses, telephone numbers; postal addresses); • Financial Data (e.g. bank account numbers and other data relating to payments); • Services Data (e.g. information regarding the services provided and progress thereof); • Particulars concerning the nature and subject-matter of relevant communications (e.g. method of communications, date and time, content and outcome of our communications). 	<ul style="list-style-type: none"> • Contract; • Legal obligation; • Legitimate interests: <ul style="list-style-type: none"> -Providing the Companies' respective services or being provided with services, in an efficient manner; -To identify methods for potential development and improvement of the relevant services and the business relationship between us (and/or the entity you are associated with); -Communications, interactions and notifications of any material changes.
Responding to any inquiries and/or comments and/or suggestions and/or complaints	<ul style="list-style-type: none"> • Identity Data (e.g. names); • Contact Details (e.g. email addresses, telephone numbers; postal addresses); 	<ul style="list-style-type: none"> • Contract; • Legitimate interests: <ul style="list-style-type: none"> -To manage, develop and improve our business operations and services offered.

	<ul style="list-style-type: none"> Particulars concerning the nature and subject-matter of such communications (e.g. method of communications, date and time, content and outcome of our communications). 	
Managing our quality, risk and security controls	<ul style="list-style-type: none"> Identity Data (e.g. names, date of birth, copies of ID/passports); Contact Details (e.g. email addresses, telephone numbers, postal addresses); Professional Details (e.g. business association and professional position); Financial Data (e.g. details of financial transactions; information regarding source of funds and purposes of financial transactions); Services Data (e.g. information regarding the services requested and/or history of services rendered); Particulars concerning the nature and subject-matter of relevant communications (e.g. method of communications, date and time, content and outcome of our communications). 	<ul style="list-style-type: none"> Legal obligation; Legitimate interests: <ul style="list-style-type: none"> -To manage, review, develop and further improve our respective services; -To ensure business continuity; -To monitor the performance of our policies and procedures; -To investigate and rectify any incidents that may arise and to provide relevant information to any competent persons concerned.
Direct marketing activities, such as: -Notification for and/or delivery of publications, announcements and other promotional material; - Updating you about legal and other developments that may be of interest to you;	<ul style="list-style-type: none"> Identity Data (e.g. names); Contact Details (e.g. email addresses, postal addresses); Professional Details (e.g. business association and professional position); 	<ul style="list-style-type: none"> Consent; or Legitimate Interests: <ul style="list-style-type: none"> -Promoting our business and services; -Organizing and delivering such promotional activities; -Developing our business relationship with you (and/or the entity you are associated with).

-Inviting you to conferences, seminars or other events that may be of interest to you.	<ul style="list-style-type: none"> • Services Data (e.g. information regarding the services requested and/or history of services rendered) 	
Maintaining video surveillance (CCTV cameras)	CCTV images	<ul style="list-style-type: none"> • Legitimate interests: -Security and access controls. In particular, for the protection and security of our personnel, visitors, and property by deterring, preventing and, should the need arise, investigating unauthorized physical access/tresspass, vandalism and damage to our premises, and criminal acts such as theft and assault and/or attack against individuals.

6. FURTHER INFORMATION ON OUR COMPLIANCE OPERATIONS

In compliance with applicable laws, specifically the Anti-Money Laundering Law, the Sanctions Law, and the Administrative Services' Provision (ASP) Law, we collect Personal Data as part of our due diligence and reporting obligations, as a regulated entity.

Once the services we provide fall under the scope of the above-mentioned Laws, Personal Data is collected when establishing a business relationship, conducting significant financial transactions and performing periodic updates depending on their risk level. This Data may include identification details, financial records, contact details, professional and/or business information and other relevant information necessary to verify the identity of individuals, legal entities and their activities. The Data is provided through questionnaires filled by the client if they are an individual, or by the appropriate connected individuals if the client is a legal entity.

The collected Personal Data can be reviewed by the Cyprus Bar Association ("CBA"), which is our Supervisory Authority. Additionally, in the cases of clients who are legal entities, we are obliged to disclose to the Cyprus Registrar of Companies the identification details of the Directors, Secretaries and Beneficial Owners of those legal entities, to be included by the Registrar of Companies in their appropriate registers (e.g. the Register of Beneficial Owners). Where the client is a Trust, we are obliged to disclose to the Cyprus Securities and Exchange Commission information ("CySEC") information about the Settlor, Protector, Trustees and Beneficiaries, for the inclusion of this information in the Trusts Register (managed by CySEC). Finally, information may be disclosed to the Ministry of Finance, the Police, MOKAS (Financial Intelligence Unit) and to the CBA if we have reporting obligations arising from the restrictive measures and/or sanctions imposed on countries, territories, entities, or specific natural or legal persons or bodies or institutions by the European Union and the United Nations' Security Council. For further information about possible further disclosure of the information we Process for Compliance purposes, please refer to the relevant section below.

7. “SENSITIVE” DATA

It may be necessary to collect and use Special Category Data in order for us to provide our respective services, mainly where the individual concerned gives explicit consent to the Processing of such Data or manifestly makes such Data public, or where necessary for the establishment, exercise or defence of legal claims. For example, we may Process information about health where it is a subject matter in legal proceedings or information about your trade union membership when advising you on employment law matters.

We may also collect and use information regarding criminal convictions and offences or related security measures where and as required or permitted by law, for example in order to for us to comply with our legal and regulatory obligations under the anti-money laundering legal framework and/or where necessary for a particular service we are providing (e.g. in the course of us representing you in criminal proceedings).

We do not offer our services directly to children (i.e. persons under the age of 18), but we collect and use the Data of children where necessary for the provision of certain services (e.g. family law, immigration, residency and citizenship, and trusts services). In such a case, we will only Process children’s Data with the consent and authorisation of their parents and/or legal representatives, and only use such Data for the pre-agreed purposes.

8. HOW YOUR PERSONAL DATA IS COLLECTED

Most of the Personal Data we collect come from the relevant individuals themselves. For example, we may collect your Data when you get in touch with us in person or via phone, email, or other communication methods, or when you visit the Website or our premises (e.g. through our CCTV cameras).

We may also receive your Data from our clients, associates, suppliers and service providers, or from others acting on their instructions, on a “need-to-know” basis. For example, where our clients are individuals, we may be provided with information regarding their family members, their authorized representatives/agents and other service providers/advisors to such clients. In case of legal entities, we may obtain Personal Information of their authorised representatives/agents, shareholders, Ultimate Beneficial Owners (UBOs), officials, partners, personnel, administrators and trustees. Depending on the services we provide, we may collect Data regarding counterparties to and/or other persons involved in the relevant transaction or legal and/or other proceedings. We will only request to receive Personal Information of such individuals if and to the extent required in the context of the provision of our services, or for us to be provided with services.

Where our clients, associates, suppliers or service providers give us Personal Data concerning others, they are required to only disclose such Data to us when a legal justification for the relevant disclosure applies. Additionally, we may rely on them for the provision of any appropriate information to the individuals the Data relate to (e.g. when we do not have direct contact with such individuals and it may not be possible for us to notify them, or where such notification would involve disproportionate effort).

Moreover, it may be necessary for us to obtain Personal Data from other third parties, such as public and/or regulatory and/or supervisory authorities and other public institutions; and/or other entities or individuals that are not associated with our clients, associates or service providers and suppliers (e.g. from our own suppliers of screening databases for regulatory compliance checks).

We may also collect Personal Data from publicly available sources. For example, we may obtain information from publicly available registries maintained by public and/or regulatory and/or supervisory authorities (such as the Department of the Registrar of Companies and the Official Receiver of the Republic of Cyprus or competent Land Registry Offices), public registries of sanctioned natural and legal persons or politically exposed persons (PEPs), the media, the press and the internet.

9. PERSONAL DATA DISCLOSURE

Your Data is only Processed by the departments and employees that are authorised to access, consult, use and otherwise Process them, on a “need-to-know” basis.

Personal Data may also be disclosed and/or transferred to other parties, in compliance with the requirements of the Data Protection Laws. For example, we may disclose Data where it is necessary for agreed purposes (such as for carrying out the instructions of our clients); or where necessary for our own legitimate professional and business needs; or because of a legal or regulatory obligation. Such instances may include Data disclosures and/or transfers to:

- **Persons connected to us**

This may include other Companies, where appropriate for specified purposes, e.g. for the provision of services by another Company, for administrative purposes, for implementing, enforcing and monitoring our policies and procedures, or for compliance with our legal obligations.

Data may also be disclosed and/or transferred to trusted third parties that support us in the provision of our services, for example providers of technological systems, expertise, solutions and supports; file storage, archiving, records management companies; translators; professional advisors and experts; auditors; insurers; banks and other financial institutions for the execution of financial transactions. We also reserve the right to disclose Data to other third parties to whom we may assign or novate any of our rights and obligations, within the limits of the applicable laws including the Data Protection Laws.

We enter into contractual agreements with third parties acting on our behalf, pursuant to which they are bound to use Data only as instructed by us, are prohibited from using Data for their own purposes, and are required to comply with the applicable confidentiality and other Data protection obligations.

- **Persons connected to our clients, associates, service providers and suppliers**

This may include other members of and/or the agents, representatives, consultants and advisers of our clients, associates, service providers and suppliers, as well as other natural or legal persons connected to them, in accordance with any instructions/requests we are given by them.

- **Public and/or regulatory and/or supervisory authorities and other public institutions**

This may happen where there is a legal or regulatory obligation for us to do so, or where necessary for the provision of our relevant services. Examples of such authorities and institutions include the competent tax authorities; immigration authorities; the Cyprus Bar Association; and registrars of public records, such as the Registrar of Companies and the Official Receiver of the Republic of Cyprus and the competent Land Registry Offices.

- **Law enforcement authorities and courts**

We may disclose Data to law enforcement authorities (e.g. the police) and courts where we are subject to a legal obligation to do so (e.g. pursuant to an order by a competent court or where required by law for certain investigations by the competent authorities), or where necessary for us to pursue, establish and/or defend legal claims, including in the context of representing our clients in court proceedings.

- **Other persons involved in a transaction or court or other proceedings**

Depending on the particular service we provide and the instructions of our clients, Data may be disclosed and/or transferred to counterparties to and/or other persons in connection with the relevant transaction or legal and/or other proceedings (e.g. the lawyers of other litigants or parties in administrative, regulatory, out-of-court or other proceedings). In such instances, we keep our clients informed accordingly.

10. RECRUITMENT OPERATIONS

Where you apply for a job position with us, or for our Summer Internship Programme or Trainee Advocates Programme, we will collect Personal Information such as your name, contact details, academic and professional qualifications, and other information included in your CV. We may also request to be furnished with documentation supporting your application (e.g. copies of certificates and attestations of academic and/or professional qualifications) and reference letters. More Personal Information will be generated during the interview stage, such as the answers you gave and our evaluation of your interview. The provision of the aforementioned Data is a pre-requisite for us to be able to assess your application.

We may also collect information about you from other sources, such as publicly available information from professional networking media (LinkedIn) and your referees. As a matter of principle, we will obtain Data from third parties in very limited circumstances, where it is necessary for us to confirm certain information provided by you and to collect certain information necessary for us to evaluate your application. Personal Information collected during the recruitment process will not normally be disclosed to any other third parties.

We will use the Data mentioned above in order to verify your identity and qualifications, to get in touch with you, and to assess your suitability for the job positions/placements available.

11. COOKIES AND DATA PROCESSING THROUGH THE WEBSITE

The owner and Data Controller of the Website is L Papaphilippou & Co LLC.

The Website uses "cookies", namely text files that are placed on your browser by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer/device. They are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

Cookies automatically collect information about your computer/device hardware and software and your visit to the Website, such as IP addresses, browser type, domain names, access times and referring website addresses. Most of this information is collected and/or used in aggregated and/or statistical form and/or is automatically anonymized (i.e. any personally identifiable information is removed, so that the data can no longer be associated with you).

You have the ability to manage your cookie preferences and learn more about the cookies the Website uses, by using the cookies management tool on our Website. Alternatively, you may configure your cookies preferences via your web browser. If you choose to decline cookies, you may not be able to enjoy the full functionality of the Website or to fully experience its interactive features.

12. DATA TRANSFERS OUTSIDE OF THE EUROPEAN ECONOMIC AREA (EEA)

Sometimes, it may be necessary for us to transfer Personal Data in countries outside the European Economic Area (EEA) in order for us to deliver our services. This may happen, for example, where there is an international aspect to a particular service we are providing. We will undertake such transfers in accordance with the relevant provisions of the Data Protections Laws. For example, we may rely on the consent of the individual whose Personal Information is to be transferred to non-EEA countries; or we may send Data to countries that the European Commission has deemed that they offer an adequate level of protection by issuing an “adequacy decision”; or enter into specific agreements with the relevant Data recipients, the effect of which is to contractually agree on a similar or higher Data protection level.

Moreover, Data may be transferred to non-EEA countries in the course of us being provided with IT products and services. Where our suppliers of IT products and solutions are themselves (or their sub-contractors) located in non-EEA countries, we take all reasonable steps to ensure that they (and their relevant sub-contractors) provide a high standard of Data protection. In such instances, we rely on adequacy decisions (and additional safeguards) or we ensure that specific data protection agreements with our suppliers apply to that effect.

13. YOUR PERSONAL DATA RIGHTS

You have the following rights regarding your Personal Data:

Right to access	You have the right to obtain from us confirmation as to whether or not Data concerning you are being Processed and, if that is the case, access to such Data and further information in relation to them (including being provided with a copy of such Data), provided that the rights and freedoms of others are not affected.
Right to rectification	You have the right to request and obtain from us rectification of inaccurate Personal Information concerning you and, taking into account the purposes of the Processing, to have any incomplete Personal Data about you completed.
Right to erasure (“right to forget”)	You have the right to request us to delete or remove your Data where certain conditions apply, such as where: <ul style="list-style-type: none"> - We Process such Data on the basis of your consent and you later withdraw such consent, provided that no other legal ground for Processing applies; - We Process your Personal Information in order to pursue our legitimate interests and you object to such Processing, provided that no overriding legitimate grounds for the Processing apply.
Right to restrict Processing	You have the right to request and obtain from us restriction (or “blocking”) of Processing of your Personal Information for a certain period of time, provided that particular conditions apply, for example: <ul style="list-style-type: none"> - Where you contest the accuracy of such Data, for a period that allows us to verify their accuracy; - Where you have objected to us Processing of your Data on the grounds of our legitimate interests, until we verify whether the

	grounds on which we Process such Data override your rights and freedoms.
Right to object to Processing	<p>You can request from us, at any time, to stop Processing your Personal Information for direct marketing purposes (as described above) and we will stop such Processing once we receive your request.</p> <p>Moreover, you have the right to object to us Processing your Personal Data on the basis of our legitimate interests (as explained above), at any time, on grounds relating to your particular situation. Should you exercise this right, we will no longer Process such Data unless we are able to demonstrate compelling legitimate grounds for the Processing.</p>
Right to data portability	<p>You have the right to receive a copy of the Personal Data that you have provided to us and to reuse it elsewhere or to request that we transmit such Data directly to a third party of your choice, provided that:</p> <ul style="list-style-type: none"> - We Process such Data on the basis of your consent, or for the purposes of you entering into a contractual relationship with us, at your request, or for us to perform a contract we have already entered into with you; and - The relevant Processing activities are carried out by automated means.
Right to withdraw consent	<p>Where we seek to Process your Personal Information on the basis of consent, you have the right to refuse to give such consent. Moreover, where you have already given us such consent, you can revoke it at any time.</p> <p>Any such revocation will not affect the lawfulness of Data Processed prior to the revocation.</p>
Right to lodge a complaint	<p>Please do not hesitate to contact us for any issues regarding the way we Process your Personal Information.</p> <p>You are also entitled to file a complaint with a competent supervisory authority, which, in the Republic of Cyprus, is the Personal Data Commissioner (“the Commissioner”). The Office of the Commissioner can be contacted at the following details:</p> <p>Office address: Kypranoros 15, Nicosia 1061, Cyprus Postal address: P.O.Box 23378, 1682 Nicosia, Cyprus Tel: +357 22818456 Fax: +357 22304565 Email: commissioner@dataprotection.gov.cy</p> <p>More information on how to lodge a complaint with the Commissioner is available at http://www.dataprotection.gov.cy.</p>

Please contact us as explained Privacy Policy below if you want to exercise any of these rights.

We will not charge a fee for satisfying your request, unless it is clearly unfounded or excessive, or where you request additional copies of your Personal Data when exercising your right to access. We also reserve the right to decline to comply with a request that we consider to be clearly unfounded or excessive, or when other lawful grounds exist that prevent us from complying with it (e.g. because of confidentiality or professional secrecy obligations).

We may request further proof of your identity before complying with a request, a measure which will also ensure that Personal Information is not disclosed to any persons that have no right to receive it. We may also request to receive further information regarding the nature and subject-matter of a request, so that we can deal with it promptly and efficiently.

14. DATA RETENTION

We only use, store and retain your Personal Information for as long as necessary to fulfill the purpose it is Processed for, taking into account factors such as the amount, nature and sensitivity of Data, the purposes of Processing, whether these purposes can be achieved by other means, as well as the applicable legal and regulatory requirements. We delete, destroy or anonymise Personal Information (so that it can no longer be associated with the individuals concerned) when we no longer need it.

In general:

- Data relating to clients and other legal entities or individuals we have a contractual and/or business relationship with (e.g. our clients, service providers and suppliers) are retained throughout the relevant contractual and/or business relationship, and thereafter for a period of seven (7) more years.
- The Data we collect for anti-money laundering purposes are retained for a period of five (5) years after the end of the business relationship with the client or after the date of an occasional transaction (as applicable). Upon expiration of the above-mentioned period, we delete / destroy such Personal Data, unless otherwise provided for by another law. We may retain the above-mentioned documents and information for five (5) additional years, where further retention of documents and information is required for the purpose of prevention, detection or investigation of money laundering and terrorist financing, without prejudice to the provisions on evidence applicable to ongoing criminal investigations and legal proceedings.
- Data collected in the context of our recruitment operations are retained throughout the relevant recruitment process. Thereafter, Data are retained for a period of six (6) more months after an application is rejected by us or the successful applicant declines a work/placement offer from us, for future reference purposes in the event that a suitable opportunity arises during that period. Such individuals have the right to object to the retention of their Data for this six-month period, or to request that we retain them for longer.
- Data of successful candidates collected for our Summer Internship Programme or Trainee Advocates Programme are maintained throughout the respective placements and deleted / destroyed once the placement ends. However, lists of the names and periods of traineeship / placement of past trainees and interns are respectively maintained for administration purposes. All of the Data of unsuccessful candidates, or of candidates who withdrew their interests in such a placement, are deleted / destroyed once the rejection is communicated.

We may retain Data for longer than our established data retention periods if further retention is deemed necessary in particular instances, due to any pending disputes or differences, claims, proceedings and/or investigations, or for legal or regulatory reasons.

15. DATA ACCURACY AND QUALITY

We take all reasonable steps to ensure that the Personal Data we collect and further Process are accurate, up-to-date and of satisfactory quality. Please let us know in a timely manner of any changes to the Personal Data you have given us (e.g. if your contact details change) or if you become aware of any inaccuracies about the Personal Data that we hold.

We will not be responsible for any loss or damage (whether direct or indirect) arising out of, or in connection with, any inaccurate, incorrect, out-of-date, inadequate, deficient or incomplete Personal Data that you furnish us with.

16. DATA CONFIDENTIALITY AND SECURITY

Your Personal Data will be accessed and used by us on a “need-to-know” basis, subject to authorisation controls and confidentiality obligations.

We have put in place and implement physical, electronic, and procedural safeguards to protect the Personal Information we handle, and to prevent incidents of loss, misuse, unauthorized access, disclosure and alteration. Such measures include firewalls; anti-virus, anti-spyware and anti-malware systems; encryption systems; disaster recovery measures, and access restriction and authorisation controls.

We assess the appropriate protection level by taking into account factors such as the risks posed by the particular Data Processing operations, as well as the nature, scope, context and purposes of the relevant operations and assigned confidentiality level of the relevant information. We also ensure that, by default, only Personal Data which are necessary for each specific Processing purpose are Processed.

While we are dedicated to protecting your Personal Information, security cannot be absolutely guaranteed against threats. We will notify you without undue delay in the event that we become aware of a data breach that may cause you a disadvantage.

17. WHETHER YOU HAVE AN OBLIGATION TO PROVIDE US WITH PERSONAL DATA

Where you fail to comply with a request for the provision of certain Data we need because we have a legal obligation to Process it, or where the provision of certain Data is necessary for us to enter into or perform a contract, we may have to decline to enter into or continue with the performance of the relevant contract. We will notify you accordingly in such an event.

18. CHANGES TO THIS PRIVACY POLICY

We may modify this Privacy Policy from time to time in order to reflect any changes to our practices and/or the applicable legal framework. In such an event, we will post the most recent version of this Privacy Policy (bearing the updated revision date) on the Website. Where appropriate, we will notify you of the updated version by placing a notice on the Website and/or by other proper means. We encourage you to check this Privacy Policy occasionally to ensure that you continue to be happy with how we collect and use your Personal Data. Any changes to the present will become effective as soon as the amended Privacy Policy is uploaded on the Website, unless otherwise stated in the relevant notice.

19. HOW TO CONTACT US

For any matters arising out of, or in connection with this Privacy Policy, including for exercising your rights, for requesting further information about how we Process your Personal Information, and any comments and complaints, you may contact our **Data Protection Officer** (“DPO”), Ms. Irene Anthis-Christofides, at the following details:

Email: dpo@papaphlippou.eu / ia@papaphilippou.eu

Telephone number: +357 22271000

Fax number: +357 22271111

Postal Address: L PAPAPHILIPPOU & CO LLC c/o Data Protection Officer, 17 Ifigenias Street,
2007 Strovolos, P.O. Box 28541, 2080, Nicosia, Cyprus.

Alternatively, you may submit a request through the “get in touch” form of the Website.