



PRIVACY POLICY OF D.KATSIS LLC

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1. Introduction

1.1 This privacy policy statement (the “**Privacy Policy**”) defines how the personal data of the clients of D.Katsis LLC, a company incorporated in the Republic of Cyprus under registration number HE 278572 (the “**Firm**”) are processed and what rights the clients of the Firm (the “**Clients**”) retain in relation to their personal data being in the possession of the Firm.

1.2 The European General Data Protection Regulation (the “**GDPR**”) that comes into force on the 25th of May 2018 regulates the manner in which the personal data are collected, shared and processed. The Privacy Policy has been prepared in accordance with the provisions of the GDPR.

2. Definitions

2.1 In the Privacy Policy, unless the context otherwise requires, the following terms shall have the following meanings:

2.1.1 “**Clients**” has the meaning ascribed to it in clause 1.1;

2.1.2 “**Controller**” means the natural person or legal person acting alone or jointly with others, who determines the purposes and means of the processing of personal data;

2.1.3 “**Employees**” means the employees of the Firm from time to time;

2.1.4 “**Firm**” has the meaning ascribed to it in clause 1.1;

2.1.5 “**GDPR**” has the meaning ascribed to it in clause 1.2;

2.1.6 “**Personal data**” means any information relating to an identified or identifiable natural person;

2.1.7 “**Privacy Policy**” has the meaning ascribed to it in clause 1.1;

2.1.8 “**Processor**” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller; and

2.1.9 “**Data subject**” means the natural person to whom the Personal data refer.

3. Data Controller

3.1 The Firm is the data controller. The contact details of the Firm are as follows:

Email: info@katsislaw.com

Address: 6 Georgiou Katsounotou, 3036 Limassol, Cyprus

Telephone: +357 25 37 01 37

Fax: +357 25 37 01 38

3.2 The Firm treats data protection and privacy issues with utmost care. In addition the Firm strives to apply such policies and mechanisms which ensure high standard of security. Appropriate electronic and procedural measures are used in order to make sure that the personal data being in the Firm's possession are not accessible by any unauthorised person. The Employees are trained how to handle and process personal data strictly limited within the course of business, while the methods and electronic systems used for processing and sharing of personal data, where permitted, provide sufficient guarantees of protection.

4. Types of Personal Data Processed

4.1 The Firm mainly processes Personal data which are required for the provision of legal, fiduciary and other services, including amongst others:

- contact details: name, position, organisation, postal addresses, email addresses and telephone numbers (including mobile number, if applicable);
- information required by the Firm to conduct due diligence regarding the current and future Clients in order to meet legal and regulatory requirements, in particular in respect of anti-money laundering legislation (e.g. passport, I.D., utility bills, source of funds etc.);
- information provided by the Client for the purpose of enabling the Firm to provide the requested services;
- financial information, such as bank account details;
- meetings attended and visits to the common areas of our premises for our security;
- technical information: via the access of the Client on the Firm's website and technology services, being IP address, browser type and version (e.g. Internet Explorer, Firefox, Safari etc.), time zone setting, browser plug-in types and versions, operating system you are using (e.g. Vista, Windows XP, MacOS, etc.), device type, hardware model, MAC address, unique identifiers and mobile network information etc.; and
- online data: via the Client's access on the Firm's website and technology services, information about the Client's visit including URL clickstream to, through and from the Firm's website (including date and time), information about the Client's network as such as information about devices, nodes, configurations, connection speeds and network application performance etc.

4.2 The Personal data may be collected either directly by the Data subject or indirectly through intermediaries and other third parties acting on behalf of the Client, such as employees, agents or other service providers.

5. Purposes of Collecting and Processing

5.1 The Personal data are collected and processed for the following purposes:

- to establish a client relationship for the provision of legal services by the Firm to the Data subject;
- to perform a legal contract to which the Data subject is a party or to take actions at the request of the Data subject prior to entering into such contract;
- to comply with the Firm's legal obligations deriving from AML Legislation;
- to secure (i) the protection of the vital interests of the Clients and the Employees by any actions which jeopardize their physical integrity and (ii) the Firm's systems and premises from any hostile actions;
- to protect the Firm's information assets and technology platforms from unlicensed access or usage and to monitor for malware and other security threats; and
- for any other purpose which is not explicitly stated, provided that the Client consents in writing for such processing.

6. Potential recipients of Personal data

6.1 The Firm may share the Personal data processed by the Firm with the physical and legal persons listed below:

- in the context of provision of fiduciary and banking services by the Firm, the latter may share the Personal data with associates (such as accounting and audit firms, registered agents, service providers, etc.) as well as financial institutions, following the written instruction received by the Clients;
- Employees who are properly informed about the provisions of the GDPR and are bound by the confidentiality agreement executed with the Firm;
- associated law firms and arbitrators for the purposes of legal and or arbitration proceeding, as applicable;
- computer centers which provide outsourced IT and communication support, backup and other IT services with whom the Firm has entered into confidentiality agreements while the Personal data shared are always encrypted;
- courts or tribunals, upon receipt of a court order or judicial or administrative order;
- governmental bodies and public authorities, including tax authorities, who have legitimate interest on such Personal data; and
- to any other person for which the Data subject has given his/her consent.

7. Legal basis for collection of Personal data

7.1 The Firm processes the Client's Personal data based on the below legal grounds:

- the Firm obtains the written consent of the Client. Such consent is required to be obtained when (i) the Firm collects the Personal data for advertising and marketing

purposes or (ii) for a purpose which is not related to the services provided to the Client by the Firm;

- for the entry into/performance of the contractual obligations under a contract entered into between the Firm and the Data subject regarding the provision of legal and or other services;
- compliance by the Firm with its legal obligations imposed by any applicable legislation; and
- to pursue the legitimate interests of the Firm, the Clients and the Employees, provided that such legitimate interests shall not override the right of the Data subject.

8. Term of retention

8.1 The Firm processes the Personal data only for such period which is necessary in relation to the purpose for which they are processed. The Clients are entitled to have their Personal data collected by the Firm erased and no longer processed where (i) such Personal data are no longer necessary for the purpose they are collected or processed, (ii) the Client's consent has been withdrawn or (iii) the Client objects to the processing of the Personal data. Irrespective of the latter, the Firm reserves its legal rights for further retention of the Client's Personal data in order to comply with its obligations under the relevant provisions of the Cyprus laws.

9. Security of storage

9.1 The Firm implemented specific organizational and technical mechanisms which ensure high level of security of the Personal data. The Firm strives to use physical and electronic filing systems which provide for the protection of the Clients' Personal data against unlicensed or unlawful processing, accidental loss, destruction or damage.

9.2 In addition to the security policy undertaken by the Firm, the Data subjects are highly recommended to use only secured emails and secured networks when transmitting their Personal data to the Firm.

10. Rights of the Data subjects

10.1 The Data subjects have certain rights under the GDPR, including amongst others:

- the right to be informed within one month from the receipt of the request by the Firm, which is obliged to provide such information free of charge electronically, in a compatible, machine-readable form;
- the right of access to the Personal data, including the purpose of the processing, the categories of Personal data concerned, the recipients to whom the Personal data have been disclosed, the proposed period of retention of such Personal data;
- the right to rectification of inaccurate Personal data concerning the Data subject;

- the right to erasure /“right to be forgotten”;
- the right to the restriction of processing;
- the right to data portability under which the Client is entitled to receive his/her Personal data in a structured, commonly used and machine-readable format and to transmit those data to another controller;
- to withdraw their consent where processing relies on consent; and
- to lodge a complaint before the Data Protection Commissioner of the Republic of Cyprus.

11. Changes to the Privacy Policy

11.1 The Privacy Policy can be accessed in the Firm’s website. Any changes to the Privacy Policy will be announced to the Firm’s website and each Client will be informed about the amended Privacy Policy by visiting the website periodically. Any updated version of the Privacy Policy will bear the relevant date of publication, in order to be clear which is the last modified version.

12. Contact

12.1 For any further information regarding the management of the Personal data, please feel free to contact the Firm at info@katsislaw.com. Alternatively, you may send your written request to the Firm’s offices situated at Georgiou Katsounotou, 6, 3036, Limassol, Cyprus.

6 April 2018