



A. ONOUFRIOU
& ASSOCIATES LLC
LAW FIRM



A.O. SOFIANA
FIDUCIARIES
LTD

PRIVACY POLICY

OF

A. ONOUFRIOU & ASSOCIATES LLC & A.O. SOFIANA FIDUCIARIES LTD

This Privacy Notice sets out how **A. Onoufriou & Associates LLC** and its subsidiary **A.O. Sofiana Fiduciaries Ltd** (collectively the “Firm”) processes data, whether on individuals (including personal data in respect of individuals who are clients, intermediaries or other third parties that the Firm interacts with, or any individual who is connected to those parties) or otherwise. Where the data held are on individuals, this document also sets out the rights of those individuals in respect of that personal data. This policy aims to provide you with information on what type of information we collect, how it is used and the circumstances where it could be shared with third parties.

The Firm has prepared this Privacy Policy in accordance with the provisions of the EU General Data Protection Regulation (“GDPR”) and applies to former, existing and potential clients as well as to any visitors of the Firm’s website.

The protection of your privacy and personal information is of great importance to the Firm. We are committed to safeguarding any client information we collect, process and store, applying all reasonable measures, including strict security standards to ensure that the clients’ personal data will be processed in a manner that provides protection against unauthorized or unlawful processing and against accidental loss, destruction or damage. All data is handled by appropriately trained personnel in accordance with the laws. Furthermore, the Firm endeavors to ensure that any parties with whom it co-operates apply the same high standards when it comes to data protection and privacy as the Firm.

Types of Data Processed

The data which the Firm processes, in the context of providing legal and other services to its clients, includes (but is not limited to) the following:

- contact details (including names, date of birth, postal addresses, email addresses and telephone numbers);
- information required by the Firm to meet legal and regulatory requirements, in particular in respect of anti-money laundering legislation, including information on source of funds and source of wealth;
- information provided in the course of the provision of legal and other services (for example, information on financial wealth and assets held, transactions entered into, tax status, disputes and court proceedings engaged in);
- financial information, such as payment related information;
- meetings attended and visits to our offices;
- any other information you may provide to the Firm.

In certain instances, the personal data that the Firm processes may include data on a person's race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health data, data on a person's sex life or sexual orientation or data relating to a person's



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criminal record or alleged criminal activity. In such instances, the legal bases for processing that data may include explicit consent or the processing is necessary for compliance with a legal obligation or for the purposes of legal proceedings or legal advice.

In any case in which a data subject chooses not to provide any personal data, the Firm may be unable to provide relevant services, or there may be restrictions on the services which can be provided.

Reasons for Data Processing

Legitimate reasons for the Firm processing data include: for identity verification and records; processing is necessary for compliance with a legal obligation to which the Firm is subject; to meet all legal, regulatory and ethical obligations applicable to the Firm; to perform and fulfill the contract with the data subject for the provision of legal services; the processing is necessary for legal proceedings, to provide legal advice or to establish, exercise or defend legal rights; for internal know how and staff training; to follow up on comments, enquiries and complaints; to promote, improve and further the provision of the Firm's services; for marketing purposes including sending updates on important legal developments and news about the Firm; and any other purpose(s) which have been agreed by or notified to you.

Recipients of Data

Potential recipients of data include employees/officers of the Firm; other service providers (legal, governance or otherwise, including any bank or financial institution providing services in relation to any matter on which the Firm is instructed) where disclosure to that provider of services is considered necessary to fulfil the purposes set out above; any sub-contractors, agents or service providers of the Firm; courts or tribunals; third parties with whom the Firm engages in relation to marketing; law enforcement agencies where considered necessary for the Firm to fulfil legal obligations applicable to it; regulators or other governmental or supervisory bodies with a legal right to the material or a legitimate interest in any material; any registrar of a public register where the data is to be included in a public registry.

When the Firm is required or permitted to disclose information without consent, it will not disclose more information than necessary to fulfil the disclosure purpose.

Unless expressly declared in this Privacy Notice or with the prior consent of the individual, personal data collected from an individual will not be disclosed to any third party other than the above-named parties.

Processing and storage of personal data provided by you may be carried out in or from any jurisdiction within the European Union.

Retention of Data

We will retain your personal information for as long as necessary to fulfil the purpose for which the data has been obtained, and as long as we are required to do so by applicable Law. Where we have collected your personal data as required by anti-money laundering legislation, including for identification, screening and reporting, we will retain that personal data for between five and seven years after the termination of our relationship, unless we are required to retain this information by another law or for the purposes of court proceedings. Otherwise, in most cases we will retain your



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personal data for a period of seven years after the termination of our contractual or other relationship with you in case any claims arise out of the provision of our services to you.

Your Rights

Data subjects in the European Union (or any jurisdiction with equivalent legislation to the GDPR) have certain rights in respect of their personal data. These rights include: the right to withdraw any consent to processing previously given; the right of access to data; or to have data corrected, updated, rectified or erased; or for access to data to be restricted or provided to any third party; or to object to any particular processing; or to lodge a complaint with the relevant supervisory authority; or the right to data portability. Any data subject wishing to exercise any rights of these rights should send a request to info@onoufrioulaw.com.

Verification of the individual making the request will be required by the Firm. The Firm is legally required to respond to the request of the individual within 40 days and it will endeavour to do so wherever possible. The Firm reserves the right to charge a reasonable fee to cover any expenses that may arise from the request.

Raising a Concern:

You have the right to be confident that the Firm handles your personal information responsibly and in line with good practice.

The Firm takes all concerns seriously and will work with you to resolve any such concerns.

Any concerns and/or requests can be raised to the Firm's Data Protection Officer whose contact details are below:

Data Protection Officer

A. Onoufriou & Associates LLC, 27 Spyrou Kyprianou Ave. EY House, 1st Floor, 4003, Limassol, Cyprus

Tel: +357 25738530

Fax: +357 25738803

Email: info@onoufrioulaw.com

If you are not satisfied with any responses provided by the Firm you have the right to raise such matters with the Cyprus Data Protection Commissioner:

Office of the Commissioner for Personal Data Protection

1 Iasonos str., 1082 Nicosia

P.O.Box 23378, 1682 Nicosia

Tel: +357 22818456

Fax: +357 22304565

Email: commissioner@dataprotection.gov.cy



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In cases where an individual has been provided with this Privacy Notice and provides personal data thereafter, the processing may be carried out on the basis of consent. Consent may be withdrawn at any time by writing to info@onoufrioulaw.com.

This Privacy Policy is reviewed periodically to ensure that it is in line with any changes to the laws relating to privacy and personal data. Any updates will appear on the Firm's website at www.onoufrioulaw.com.