



## PRIVACY POLICY

This privacy policy (the "**Private Policy**") explains how we, George Pamboridis LLC, a limited liability company incorporated under the laws of the Republic of Cyprus with registration number HE237200, registered office address at 45 Digeni Akrita Ave., Pamboridis House, 1070, Nicosia, Cyprus, and regulated by the Cyprus Bar Association, and our wholly owned subsidiaries, (a) Pandalaw Management Limited, a limited liability company incorporated under the laws of the Republic of Cyprus with registration number HE156838; (b) Pandalaw Services Limited, a limited liability company incorporated under the laws of the Republic of Cyprus with registration number HE 184222; and (c) GP Law Limited, a limited liability company incorporated under the laws of the Republic of Cyprus with registration number HE 285776, all of the foregoing having their registered office address at 45 Digeni Akrita Ave., Pamboridis House, 1070, Nicosia, Cyprus, (collectively "**we**" "**us**" or "**our**") handle and treat personal information of the following persons ("**you**", "**your**" or "**yours**"): (i) persons that engage with us to use and/or be provided with the services we offer (the "**Services**"); (ii) our existing employees; (iii) persons that apply to work with us; (iv) persons whose personal information we may process as a result of providing the Services to third parties; and (v) persons whose personal information we may process once they enter our premises located at 45 Digeni Akrita Ave., Pamboridis House, 1070, Nicosia, Cyprus.

### I. Purpose

This Privacy Policy:

- (a) explains our approach to any personal information that we may collect from you or which we have obtained about you from a third party and the purposes for which we process such personal information;
- (b) informs you of the nature of your personal information that is processed by us and sets out your rights in respect of our processing of your personal information; and
- (c) intends to assist you in making informed decisions when using our Services and/or to understand how your personal information may be processed by us.

#### NICOSIA:

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#### ATHENS:

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## **II. Who are we and what do we do**

George Pamboridis LLC is a law firm with offices, in Cyprus (Nicosia) and Greece (Athens) that aspires to meet all the legal needs of our clients, corporations and individuals, not only in Cyprus and Greece but also in the region of South East Europe and the Near and Middle East. It aims to offer full legal support to its clients and to offer its international clientele a local insight to the markets of the jurisdictions where it operates.

Pandalaw Management Limited, Pandalaw Services Limited and GP Law Limited are entities providing administrative and nominee services such as (a) nominee shareholders; (b) nominee directors; and (c) company secretary.

Depending on the nature of the Services you request and the purpose of processing, as set out below in detail in this Privacy Policy, your data controller might be George Pamboridis LLC and/or Pandalaw Management Limited and/or Pandalaw Services Limited and/or GP Law Limited.

## **III. How to contact us**

If you have any questions about this Privacy Policy or want to exercise your rights set out in this Privacy Policy, please contact us by:

- (a) email at: [info@pamboridis.com](mailto:info@pamboridis.com), copying [sarlidis@pamboridis.com](mailto:sarlidis@pamboridis.com); or
- (b) calling us on: +357 22 75 25 25.

When contacting us, please ensure that you address your e-mail to or request to speak to Mr Grigoris Sarlidis, who is our data protection officer.

## **IV. What personal information we collect and process**

We collect and process a varied nature of information through a number of ways, an indicative list of which is set out below:

- (a) when you are our client or get in touch with us in order to become our client, we may, depending on the nature of your instructions, collect and process the following, inter alia, information:
  - Name and surname.
  - Place of work/company name (if applicable).
  - Contact information including your e-mail address, telephone number and registered/residential address.

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- VAT identification number.
- Specimen signature.
- Payment information.
- Information that you provide to us as part of us providing the Services.
- Information and documentation that we are required to request and obtain for the purposes of our compliance with applicable Know Your Client Procedures and Anti-Money Laundering laws and regulations.
- Information you provide to us for the purposes of attending meetings and events, including dietary requirements which may reveal information about your health or religious beliefs.
- Other information relevant to your request and/or provision of the Services by us to you.

Whilst we are primarily approached by and/or engaged by corporate clients, i.e. not data subjects (not natural persons) within the meaning of data privacy law and regulations, we may, as part of client instructions and legal requirements, process personal information relating to any of our clients' shareholders, ultimate beneficial owners, officers, staff, advisors, suppliers, associates, clientele and/or any person with whom our said clients have a dispute with.

We might also need to process personal information in relation to other third parties instructed either by our own clients or other persons or companies involved with us in providing the Services to our clients, including, without limitation, other law firms (whether in Cyprus or abroad), accountants, auditors, other external expert advisors, and our subsidiaries.

- (b) If you are a potential recruit interested to join our team, we may collect and process the following, inter alia, information:
- Name and surname.
  - Job title.
  - Contact information including your e-mail address, telephone number and residential address.

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- Social Insurances Number.
  - Copy of your passport or ID card.
  - Bank account details (for instance IBAN number, branch etc)
  - CV, including, without limitation, your date of birth and/or gender if you provide it to us, your education, employment history and similar matters and similar information that you may provide to us.
  - Information relating to previous criminal convictions.
  - Information relating to any health problems that you may have.
  - Other information relevant to potential recruitment by us.
- (c) If you enter our premises located at 45 Digeni Akrita Ave., Pamboridis House, 1070, Nicosia, Cyprus, we may collect and process the following information:
- Face.
  - Date and time of entry.
  - Date and time of exit.

We collect your personal information for the following purposes:

- verify your identity and onboard you or the entity you represent as our client.
- deliver the Services.
- carry out any other request made by you in respect of the Services.
- investigate or settle inquiries or disputes.
- comply with any applicable law, court order, other judicial process, or the requirements or orders of a regulatory authority.
- enforce our agreement(s) with you and/or the entity you represent.
- recruitment purposes.
- safety and integrity of our premises, staff and property.

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## **V. Legal bases to process your personal information**

We collect and process your personal information on the following legal basis:

- (a) in order to perform our obligations in accordance with any contract that we may have with you or in order to take steps to enter into a contract with you; and/or
- (b) that it is in our legitimate interest or in a third party's legitimate interest to process your personal information in such a way to ensure that we provide the Services in the best way that we can; and/or
- (c) it is our legal obligation to process your personal information to comply with any legal obligations imposed upon us (for instance applicable Know Your Client and Anti-Money Laundering requirements); and/or
- (d) on the basis that you have provided us with your explicit consent to process the personal information you have supplied us with; and/or
- (e) in reliance on any other applicable legal basis provided under applicable laws and regulations.

## **VI. How do we process your personal information**

We process your personal information as follows:

### ***Performance of the Services***

We collect and maintain personal information that you voluntarily submit to us during your use of the Services and/or submit to us following our request in order to enable us to provide the Services in the best way that we can.

### ***Business administration and legal compliance***

We use your personal information for business administration and legal compliance purposes:

- (a) when we are required under applicable laws and regulations to comply with an obligation imposed upon us, including, without limitation, Know Your Client or Anti-Money Laundering requirements.
- (b) to enforce our legal rights.

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- (c) to protect the legal rights of third parties.
- (d) in connection with a transaction to which we are a party to (for instance sale, merger or restructuring).

### ***Recruitment***

We process your personal information in order to:

- (a) To assess your suitability for any position for which you may have submitted an application for employment with us, including, without limitation, secretary, trainee, associate, senior associate and/or partner level position.
- (b) To ensure that we provide equal opportunities to all of our employees and prospective employees.
- (c) To assess your performance in order to award you accordingly or highlight areas where you can improve in order to perform better and/or contribute to our growth and success.

### ***Security***

We maintain a video surveillance system through which we process certain of your personal information, i.e. your face, date and time of entry into and exit from our premises, in order to ensure the safety and integrity of our premises, property and other persons. The foregoing video surveillance system captures only images and no sound.

## **VII. How to access your information and your other rights**

You have the following rights in relation to the personal information we hold about you:

***Your right of access:*** You have the right to obtain confirmation as to whether or not personal information concerning you are being processed.

***Your right to rectification:*** You have the right to obtain from us without undue delay the rectification of inaccurate personal information concerning you. If you are entitled to rectification and if we have shared your personal information with others, we will let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

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**Your right to erasure:** In certain circumstances (such as when you withdraw consent), you have the right to request and obtain from us the erasure of your personal information without undue delay and we have the obligation to erase the same without undue delay.

We are not required to comply with your request to erase your personal information if the processing of such information is necessary:

- (a) for compliance with a legal obligation; or
- (b) for the establishment, exercise or defence of legal claims.

There are certain other circumstances in which we are not required to comply with your erasure request, although these two are the most likely circumstances in which we would deny that request.

**Your right to object:** You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

Once you have objected, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

**Your right to data portability:** Where processing is based on your consent or on the performance of a contract with you; and such processing is carried out by automated means, you have the right to ask us to provide your personal information in a structured, commonly used and machine readable format and to transmit, where technically feasible, such information to another controller without hindrance.

**Your right to restrict processing:** You can ask us to “block” or suppress the processing of your personal information in certain circumstances, such as where you contest the accuracy of that personal information or you object to us. If you are entitled to restriction and if we have shared your personal information with others, we will let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

**Your right to withdraw consent:** If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time. However, you should be aware that if you choose to do so there may be potential consequences which we will tell you about at that time.

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***Your right to lodge a complaint with the supervisory authority:*** If you have a concern about any aspect of our privacy practices, including the way we have handled or handle your personal information, you can report such concern with the local supervisory authority, being the office the Office of the Commissioner for the Protection of Personal Data.

Please note that some of your above rights may be limited where we have an overriding interest or legal obligation to continue to process your personal information or where such information may be exempt from disclosure due to reasons of legal professional privilege or professional secrecy obligations.

In the event you wish to exercise any of your above mentioned rights please get in touch with us using the contact details referred to in paragraph III above. We reserve the right to ask you for proof of your identity if you contact us as aforesaid.

## **VIII. Confidentiality and Security**

We are committed to ensuring that your personal information is and remains secure and confidential. In order to prevent unauthorised access, use or disclosure of your personal information, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information that we collect. Our security technologies and procedures are regularly reviewed to ensure that they are up to date and effective. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Policy and applicable law and regulations.

Information you provide to us is stored on our secure servers that are protected through access codes and a firewall. Unfortunately, the transmission of information via the internet is not completely secure. While we will take reasonable steps to protect all information submitted to us and/or received by us in accordance with this Privacy Policy, we cannot, in any event, guarantee the security of any information transmitted to us via e-mail and as such any transmission is at your own risk.

Certain other information you provide to us in paper form is stored in designated secure spaces within our premises where no unauthorised access is permitted.

All of our partners, employees, consultants, workers and data processors, who have access to, and are associated with the processing of your personal information, are obliged to respect the confidentiality and security of such personal information.

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## **IX. Processors and other controllers**

We may appoint sub-contractor data processors as required to deliver the Services, such as, without limitation, document processing and translation services, IT systems or software providers, IT Support service providers, document and information storage providers, who will process personal information on our behalf.

Further, we may appoint external data controllers where necessary to deliver the Services, including, without limitation, auditors, accountants or other third party experts.

When doing any of the above, we will comply with our legal and regulatory obligations in relation to your personal information, including, without limitation, maintaining appropriate safeguards in place.

## **X. Who do we share your personal information with**

Any information that we collect or that you provide to us may be shared and processed by any of the following categories of third parties as may (depending each time) be necessary:

- (a) Public and governmental authorities, including, without limitation, regulatory authorities, tax authorities, and corporate registries.
- (b) Credit institutions and other financial institutions.
- (c) Third parties to whom we outsource certain services, including, without limitation, document processing and translation services, IT systems or software providers, IT support service providers, document and information storage providers.
- (d) Third parties engaged in the course of the Services we provide to clients such as outside counsel, arbitrators, mediators, clerks, witnesses, cost draftsmen, court, opposing party and their lawyers, document review platforms and experts such as tax advisors, auditors or valuers.
- (e) Third party postal or courier providers who assist us in delivering our documents related to a matter that concerns you.

The above is a non-exhaustive list of person and entities with whom we share your personal information, and there may be other examples where we need to share with other parties in order to provide the Services as effectively as we can.

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## XI. How long do we keep your personal information for

Where we no longer require your personal information we will ensure that it is either securely deleted or destroyed or stored in a way which means it will no longer be used by us. In particular:

**Provision of Services:** Subject to any further lawful processing (including, without limitation, requirement to retain personal information for compliance with a legal requirement to which we are subject to), we will retain a client's personal information for at least five years from the date of our last interaction with the client.

**Employees:** Subject to any further lawful processing (including, without limitation, requirement to retain personal information for compliance with a legal requirement to which we are subject to), personal information of employees will be retained for a period equal to the relevant limitation period of actionable claims prescribed under applicable law.

**Prospective employees:** Subject to any further lawful processing (including, without limitation, your consent to us to retain such information, and/or requirement to retain personal information for compliance with a legal requirement to which we are subject to), personal information of prospective employees will be securely deleted or destroyed following an unsuccessful application for employment.

**Persons entering/exiting our premises:** Subject to any further lawful processing (including, without limitation, requirement to retain personal information for compliance with a legal requirement to which we are subject to and/or processing is necessary on the basis of our legitimate purposes, for instance pursue a claim against a person for injury or damage to property), personal information of persons entering and exiting our premises will be retained for a period of 1 week from the moment of capture.

Retention of your information and subsequent deletion, destruction or storing in a manner that we no longer can use such information, will be in compliance with applicable laws and regulations.

## XII. Changes to this Privacy Policy

We may make changes to this Privacy Policy from time to time. To ensure that you are always aware of how we use your personal information we will update this Privacy Policy from time to time to reflect any changes to our processing of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. Where it is practicable, we will notify you by email of any significant changes.

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**PAMBORIDIS LLC**

ADVOCATES & LEGAL ADVISORS

However, we encourage you to review this Privacy Policy periodically to be informed on how we use your personal information.

*Last updated May 2018*

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