

Privacy Statement

Data Controller of the Personal Data is:

Elena Papandreou & Co. LLC
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1. Introduction

Elena Papandreou & Co. LLC, a limited liability company registered under the laws of the Republic of Cyprus, under registration number 244833 and registered office at 8 Stassinos Avenue, Photiades Business Center, 2nd Floor, Office 201, 1060 Nicosia, Cyprus, P.O. Box 22599, 1522 Nicosia, Cyprus ("**our Company**" or "**Epap**"), is strongly committed to complying with all protection of personal data and privacy requirements. Epap is obliged to comply with local data protection laws, as may be amended from time to time, as well as the European General Data Protection Regulation (EU) 2016/679 ("**GDPR**").

This statement details how we collect, process and protect your Personal Data in the course of carrying out our services. It also provides information regarding your rights, how you can contact us, if you have any questions in relation to your Personal Data, and how we handle your personal data.

As part of this fundamental obligation, Epap is committed to appropriately safeguard and use your Personal Data, as defined in the GDPR ("**Personal Data**"), and not to disclose your information to anyone, other than as set out in this Privacy Statement. In this statement "we", "us" and "our" refer to Epap.

2. Data Collection and Use of Personal Data

2.1. Data collection and processing

In the course of providing services to you and specifically when performing due diligence checks in connection with our services (or discussing possible services we might provide to you as a prospective client), we may collect or obtain Personal Data from you. It is noted that Personal Data may be collected from other sources as well.

We will generally, process your Personal Data when such processing is necessary in order to be able to facilitate your request, or to comply with a legal obligation, or to provide you with information as regards to any amendments of the law, regulation, directive or changes to our policy. Please also refer to point 8, 'Changes to the Privacy Policy' below.

2.2. Use of data

Our Company's policy is to use Personal Data for the purpose for which it was originally collected, as required in order to fulfil your request and to provide the requested services to you.

Your Personal Data is not used for any purposes other than for those which it was originally collected, unless in such cases where your permission is granted, it is required by the law, or it is necessary in order to be able to facilitate your request.

2.3 Legal grounds for using your Personal Data

As with any provider of professional services, we are subject to legal, regulatory and professional obligations. We are required to keep records in order to be compliant with those obligations, and those records generally contain Personal Data.

The local data protection laws, as may be amended from time to time, as well as the GDPR, allow professionals to process Personal Data where a legal right, duty or requirement exist.

Epap generally keeps Personal Data as long as is considered necessary in order to fulfil your request (including as required by law or regulation). Please refer to point 7, 'Retention', below.

3. Protection of your Personal Data

In accordance with the provisions of the local data protection laws, as may be amended from time to time, as well as the GDPR, we would like to state that any information that either you or any other individuals connected with the services will provide to us and which will be subsequently kept in our system, will be strictly confidential. Any such information provided will be used only for the purposes for which it is collected and will not be disclosed to any third parties, except as required and permitted by law, or as is necessary in order to be able to facilitate your request.

Our company uses a variety of physical, electronic and managerial measures to ensure that we keep your Personal Data secure, accurate and up to date. Please refer to point 6, 'Your responsibilities', below.

4. Provision of Information to third parties

We appreciate the fact that your Personal Data is valuable and we take all reasonable measures to protect the same while in our care. In the course of carrying out any services requested, your Personal Data may be provided to third parties if is required in order to be able to facilitate your request, your business. In some instances, the information may be disclosed to our auditors, insurers or legal advisers, as well as to your entity's auditors, bankers and legal advisers, or any other third party to the extent that this is required, by any court of competent jurisdiction, or by a governmental or regulatory authority or where there is a legal right, duty or requirement to disclose such information.

5. Your rights

The local data protection laws, as may be amended from time to time, as well as the GDPR, provide certain rights to you in relation to your Personal Data.

You have the right to request details of the Personal Data we hold about you and how we process such Personal Data. You may also have a right in accordance with local data protection laws, as may be amended from time to time, as well as the GDPR to have your Personal Data rectified or deleted, to request that we restrict our processing of that information, to stop unauthorised transfers of your Personal Data to a third party and, in some circumstances, to have your Personal Data transferred to another organisation.

In case you do not agree with the processing of your Personal Data, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations.

If you wish to exercise any of your rights described above, please notify our Data Protection Officer using the email address indicated in point 9, 'Contact Us', below.

6. Your Responsibilities

When we collect, process and use Personal Data as may be submitted to our Company, we do not assume any responsibility for verifying the ongoing accuracy of the content of the Personal Data. You are solely responsible for ensuring that the information provided to us is accurate and up to date. Our company must be informed in cases anything changes as regards to your information in order to update our records accordingly.

7. Data Retention

Epap retains and processes your Personal Data for as long as is considered necessary for the purpose for which the information was collected (including as required by law or regulation).

Any Personal Data collected and processed which was specifically collected and processed in order to be able to facilitate your request, shall be retained in order to be able to fully complete your relevant request and in order to be able to continue to provide you with any services you may request. The Personal Data may also be retained for a period of time as is required by the applicable laws or regulations.

8. Changes to the Privacy Policy

We retain the right to amend or modify our Privacy Statement from time to time to reflect our current privacy policies. To let you know when we make changes to this privacy statement, we will amend the revision date at the bottom of this page. The new modified or amended privacy statement will apply from that revision date. Therefore, we recommend that you periodically review this Privacy Statement in order to be informed on how we are using, store and protecting your information.

9. Contact Us

In case you have any questions, enquires or complaints as regards to your Personal Data, you can contact our Data Protection Officer at dpo@epaplaw.com.

If you are not happy with the response you receive, you have the right to escalate your complaint to the Data Protection Commissioner. In case you would like to be directed to the Office of the Data Protection Commissioner, please contact us.

Latest update: 22nd of June 2018