



PRIVACY STATEMENT AND POLICY

2018

Introduction – Legal justification

This privacy statement and policy is given in accordance with the provisions of the General Data Protection Regulation (EU) 2016/679 (the “**GDPR**”) on the protection of natural persons with regards to the processing of personal data and the free movement of such data, the Processing of Personal Data (Protection of Individuals) Law of 2001 (as amended from time to time) as well as any applicable laws in Cyprus and/or abroad.

(Reference to “us”, “we” or “Kinanis LLC” is a reference to, and to any member of Kinanis LLC and/or its affiliate companies and/or its associates as well as its employees. References to “you” or the “client” means any person or entity dealing with us in any capacity whatsoever).

We collect, use and process your personal data information which have been provided or shall be provided in the future by you or by third parties acting as your agents, associates, employees or representatives (with or without your express consent) or in any other capacity or that have been extracted from the operation of your account or during any other services provided by us, for purposes relevant to our cooperation and the provision of services offered by us, including but not limited to services for which you retain us to provide, enquiring about our services (including conflict checks) etc.

The collection and processing of such personal data is necessary for compliance of Kinanis LLC with its legal obligations under any applicable laws as well as guidelines issued by the relevant regulator in relation to the activities of Kinanis LLC. We note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

Recipients of your data and confidentiality

Any information regarding yourself shall be kept confidential by us in the course of our cooperation and any such information shall not be disclosed or made known to third parties other than the employees and/or the associates and/or the agents of Kinanis LLC which may be situated outside of the Republic of Cyprus and/or the European Union and engaged by Kinanis LLC as may be required and/or deemed necessary for the provision of services by us. We may be obliged to disclose your personal data if this is required and we are

ordered to do so by a Court of law or any regulatory body or law enforcement agency or to any such person to whom such information may have to be given in any part of the world pursuant to any applicable laws or regulations.

Storage of Personal Data

Your personal data shall be safely and securely retained for a period of time only as we are engaged to provide services to you. We may retain your data for a longer period if we consider this necessary in order to comply with the applicable laws. We take reasonable measures to protect your personal data from unauthorized access or misuse; however, we cannot guarantee or warrant its security, as the transmission of data through the internet is never absolutely secure.

What we shall do with your Personal Data

Your personal data shall be collected, recorded, organized and stored electronically and manually in our records, as well as transferred to third countries within or outside the European Union, as may be required and/or deemed necessary within the course of provision of services by us. Such third countries may not be subject to an adequacy decision by the European Commission, however, Kinanis LLC has put in place the appropriate safeguards in accordance with the GDPR in order to ensure protection of your personal data.

Your Rights

1. **Right of access:** you have the right of access and modification of your data;
2. **Right of rectifications and erasure:** you have the right to request the rectification of your data in case these are inaccurate as well as the right to request the erasure of such personal data (the right to be forgotten);
3. **Right to object to or restrict the processing of personal data;**
4. **Right to data portability:** you have the right to receive the personal data collected from Kinanis LLC in a structured, commonly used and machine-readable format as well as the right to request the transmission of those data to another controller;

5. **The right to object to automated decision-making, including profiling:** you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you;
6. **The right to lodge a complaint with a supervisory authority:** you have the right to submit a complaint with the supervisory authority in the particular Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your personal data infringes the provisions of the GDPR and/or applicable legislation;
7. **The right to withdraw your consent:** where the processing is based on your consent, you shall have the right to withdraw your consent at any time by contacting us at dataprotection@kinanis.com If you withdraw your consent for your personal data to be used for the above-mentioned purposes, we will process your request for such withdraw of consent and will thereafter cease to use and/or disclose your personal data and proceed with the erasure of your personal data within 30 (thirty) calendar days, unless this personal data information is necessary for complying with other legal obligations under Europe and national law.

Your rights may be discussed with and/or exercised by contacting our appointed data protection officer who is the person responsible to address any issues related to personal data at dataprotection@kinanis.com , telephone number: 00357 22558888.

Contact Details: Kinanis LLC, 12, Egypt Street, P.C. 1097, Nicosia, Cyprus, email: kinanisllc@kinanis.com , dataprotection@kinanis.com , website: www.kinanis.com

If, for any reason, you believe that Kinanis LLC violates the rights connected to your personal data information, you have the right to complaint to the Cyprus Commissioner of the Personal Data Protection at commissioner@dataprotection.gov.cy

We reserve the right to amend this privacy statement and policy from time to time.

Our Firm

Kinanis LLC, a law and consulting firm, is one of the leading and largest business law firms in Cyprus and advises for over 35 years the international investor and private clients on all aspects of law, tax and accounting.

Kinanis LLC absorbed the business of its shareholders which are in the legal and consulting profession since 1983, with local and international dimensions.

Experience and practice over the years brought forward the need for transformation from a traditional law firm to a more innovative multidisciplinary firm providing a full range of services combining law and accounting with the extensive expertise in corporate and tax advice to ensure that our clients will obtain the best possible spherical advice adopting the principle as to the services offered "All in one place", so that the client will find a quick, correct and efficient solution to its daily legal, accounting and tax issues in a trustworthy environment.

This combination of legal, accounting and tax services through our well qualified personnel and our involvement and participation in international transactions over the years, have established our firm as one of the key players in the field. Our involvement in international financial transactions has also provided us with the extensive expertise in representing groups, corporations, funds as well as the private client.

The firm is staffed with around 80 young, energetic and ambitious professionals, including lawyers, accountants and administrators who provide prompt, efficient and high-quality services and who are capable of meeting the current demanding challenges of the local and international business environment.

We always look to give solutions in a simple and as possible quick way focusing on the needs of each client trying to anticipate the issues before becoming a problem.

Kinanis LLC

Lawyers' Limited Company

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