

Privacy Policy

Elia & Elia L.L.C. is committed to protecting your privacy and processing your personal information in a lawful and transparent manner. This notice provides our clients with the necessary information regarding their rights and obligations and explains how, why and when we collect and process their personal data.

Who we Are:

Elia & Elia L.L.C. (hereinafter referred to as “Elia&Elia”, “we”, “us” or “our”), is registered with the Registrar of Companies of Cyprus under Registration No. HE 237943. It is also registered in the “Registry of Lawyers’ Companies” of the Cyprus Bar Association with Registration No. 85 and as such, is subject to regulation and supervision by the Council of the Cyprus Bar Association.

Our principle place of business and registered office is 339 St. Andrew Str., Andrea Chambers, 2nd floor, offices 205-207, Limassol, Cyprus. P.O.Box: 54362, 3723. Our contact details are the following:

Telephone: +35725357277;

Fax: +35725379858;

Email: info@eliallc.com;

Website: www.eliallc.com

Elia&Elia collects and processes personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and Laws.

“Personal Information”

Personal information includes any information relating to an identified or identifiable natural person. An identifiable natural person is one that can be identified, directly or indirectly, by reference to an identifier e.g. name, I.D. number or another factor specific to the physical, physiological, genetic, mental, economic, cultural or social identity of a natural person.

Data protection principles:

In order to comply with the data protection laws, the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way (lawfulness, fairness and transparency);

- Collected only for specified, explicit and legitimate purposes, that we have clearly communicated to you before initiating the processing and not further processed in a manner that is incompatible with those purposes (purpose limitation);
- Adequate, relevant and limited to what is necessary in relation to those purposes (data minimisation);
- Accurate and kept up to date, taking every reasonable step to ensure that inaccurate data is erased or rectified without delay (accuracy);
- Kept securely in a form which permits identification for no longer than is necessary for the purposes for which the personal data are processed (storage limitation);
- Processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisation measures (integrity and confidentiality)

What counts as “processing”

Processing refers to any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal bases for processing:

Personal information may only be processed for one or more of the following reasons:

- To establish a business relationship / co-operation with you and to observe and perform our obligations, based on a contract we have with you and to continue providing you with our services;
- To comply with applicable laws and regulatory obligations, including but not limited to, Anti-Money Laundering Law, Tax Law and the regulations of various supervisory authorities that we are subject to for anti-money laundering purposes and due to diligence purposes;
- To comply with any legal processes and respond to any requests from public/governmental authorities;
- To safeguard the legitimate interests pursued by us or by a third party (provided those interests are not overridden by your interests and fundamental rights) e.g. to initiate legal claims and preparing our defence in litigation procedures, to resolve complaints and handle requests made by you in relation to your data protection rights. A legitimate interest translates to when there is a business reason to use our clients' information;

- You have provided us with your specific consent for the processing of your personal information for a specific purpose. We rely on your freely given consent at the time you provide your personal data to us, to establish cooperation with us. You have the right to withdraw consent at any time. However, any processing of personal data will not be affected prior to the receipt of the withdrawal.

Types of personal information we collect:

We collect personal information directly from our clients. The personal data that we collect include:

- Full name and contact details e.g. address, telephone number, email address, etc;
- Passport/ID number;

We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice. We will not request sensitive personal data about you. If we ever need to request such information, your explicit consent will be requested in relation to such processing.

We may also collect and process personal data lawfully obtained both from 3rd parties, such as other service providers or from publicly available sources (i.e. the Department of Registrar of Companies, the bankruptcy archive or others, where applicable).

Purposes for processing:

Elia&Elia takes your privacy very seriously and will never disclose, share or sell your data without your consent, *unless required by law to do so*. The purposes and reasons for processing your personal data are listed below:

- To ensure that we comply with our Regulatory Requirements when providing a service;
- We collect and store your personal data as part of our legal obligation for business, accounting and tax purposes.

If you fail to provide personal information:

You are not obliged to provide us with your personal information, however, as this information is required for us to provide you with our service, we will not be able to offer our services without it and/or not be able to provide our legal services in the best possible manner to you.

Access to your personal information:

Your personal information may be accessed by selected members of our staff or any other party with a need to know, under strict confidentiality, only for the purposes described in this notice.

Storing of personal information:

We will store information in electronic form, in one or more combined files, which will be retained by us in accordance with applicable laws.

Protection of personal information:

We have in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed; and to deal with any suspected data security breach. We will notify you and the applicable regulatory authority of a suspected breach, where we are legally required to do so.

Please note that although we do our best to protect your personal information, unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. We are not responsible for the security of data transmitted to or from us or for the non-delivery of any emails. If we believe that the security of your personal information which is in our possession or control may have been compromised, we will notify you as soon as possible in accordance with applicable laws. If you have reason to believe that your interaction with us is no longer secure, you must notify us immediately.

Sharing of personal information:

We will not share your personal information with any other third parties, unless we are obliged to in order to comply with a legal or regulatory obligation or official request by governmental authorities and provided that suitable safeguards or agreements are in place or you have provided us with your consent.

We will not transfer your personal information outside of the EU to third countries and to organisations which do not provide the same or adequate data protection regulations as in the EU.

Retention of personal information:

We will not retain your personal information for longer than required to fulfil the purposes it was collected for, including the satisfaction of legal, accounting, or reporting requirements and obligations.

Data protection rights:

You may exercise your data protection rights at any time by submitting a written request to our Data Protection Officer. Your rights include the following:

- **Request access to your personal information.** You may request a copy of the personal information we hold about you at no cost.
- **Request correction or updating of the personal information that we hold about you.** Please note that we may need to verify the accuracy of the new information you provide to us.
- **Request erasure of your personal information.** You may ask us to delete or remove personal information where there is no good reason for us continuing to process it. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you at the time of your request (if applicable).
- **Withdraw your consent or object to processing of your personal information,** in case the processing is carried out solely on the basis of your consent e.g. for direct marketing purposes, or on the basis of a legitimate interest.
- **Request restriction of processing of your personal information.** You may ask us to suspend the processing of your personal information e.g. if you want us to establish its accuracy or the reason for processing it.
- **Request transfer of your personal information to another party.** We may provide your personal information to another data controller of your choice, if the information has been provided to us in a structured, commonly used, machine-readable format.
- **Lodge a complaint with the Data Protection Commissioner.** If you have any complaints in relation to the manner in which Elia&Elia has handled any request you have made in relation to your personal information, you may contact our Data Protection Officer. If your concern is not resolved, you also have the right to make a complaint at any time to the Office of the Commissioner for Personal Data Protection of The Republic of Cyprus, as follows:

Tel.: **22818456**

Fax: **22304565**

E-Mail: **commissioner@dataprotection.gov.cy**

Contact our Data Protection Officer:

If you have any questions about this notice, please contact the Data Protection Officer via mail at 339 St. Andrew Str., Andrea Chambers, 2nd floor, offices 205-207, Limassol, Cyprus. P.O.Box: 54362, 3723 or via email at info@eliallc.com.

Changes to our Policy:

We may change our privacy policy from time to time, so as to reflect on our current privacy practices and applicable laws. Anytime there is a change to our privacy policy, we will revise the updated date at the bottom of this page. We suggest you periodically review this privacy policy that can be found on our website www.eliallc.com, to keep informed on how we protect your personal data.