

Eojourian & Georgiou LLC  
Advocates and Legal Consultants  
t: +357 22 101 785  
w: [www.eojgeo.com](http://www.eojgeo.com)

## **PRIVACY POLICY**

### **1. INTRODUCTION**

This is the privacy policy (the "**Privacy Policy**") of Eojourian & Georgiou LLC (the "**Law Firm**" "**We**" "**Our**") and describes our commitment to protecting the privacy and personal information the Law Firm collects from our clients and prospective clients ("**You**" "**Your**") and information collected when visiting our website at [www.eojgeo.com](http://www.eojgeo.com) (the "**Site**").

### **2. GLOSSARY OF TERMS AND DEFINITIONS**

**Contract:** The contract is an agreement between the Law Firm and the Clients defining the specifications and obligations of each party.

**Cyprus Data Protection Law:** National law providing for the protection of natural persons regarding the processing of personal data and for the free movement of such data of 2018 (Law 125(I)/2018)

**GDPR:** The General Data Protection Regulation 2016/679 was put into effect on May 25, 2018 and it is a regulation on data protection and privacy in the European Union and the European Economic Area. It also addresses the transfer of personal data outside the EU and EEA areas.

**Personal data:** Personal data is any information that relates to an individual who can be directly or indirectly identified. Names and email addresses are obviously personal data. Location information, ethnicity, gender, biometric data, religious beliefs, web cookies, and political opinions can also be personal data.

**Pseudonymous data:** Pseudonymous data can also fall under the definition if it is relatively easy to identify someone from it.

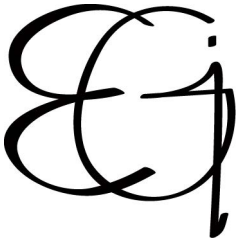
**Data processing:** Any action performed on data, whether automated or manual. For example, collecting, recording, organizing, structuring, storing, using, erasing.

**Data subject:** The person whose data is processed. These are your customers or site visitors.

**Data controller:** The person who decides why and how personal data will be processed.

**Data processor:** A third party that processes personal data on behalf of a data controller.

**End-user:** The end-user is the person who is going to use the Law Firm's services through the Clients application for the provision of services.



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**Third Party:** 'means a natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

**Client/ Prospective Client:** The client and/or prospective client is the person the Law Firm wishes to provide and/or provides its services to.

### **3. WHO DOES GDPR APPLY TO?**

GDPR protects EU residents and citizens from losing control of their personal information. Your business can be anywhere in the world, but the GDPR applies if your business either offers services and goods to EU citizens or residents, and/or monitors visitor behavior and attracts EU citizens or residents.

### **4. WHAT IS CONSENT?**

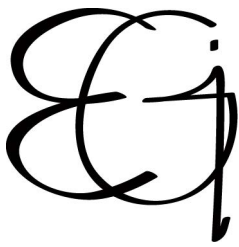
Processing personal data is generally prohibited, unless it is expressly allowed by law, or the data subject has consented to the processing. While being one of the more well-known legal bases for processing personal data, consent is only one of six bases mentioned in the General Data Protection Regulation (GDPR). The others are contract, legal obligations, vital interests of the data subject, public interest, and legitimate interest.

Consent must be bound to one or several specified purposes which must then be sufficiently explained. If the consent should legitimize the processing of special categories of personal data, the information for the data subject must expressly refer to this. There must always be a clear distinction between the information needed for the informed consent and information about other contractual matters. Consent must be freely given, specific, informed, and unambiguous. If an individual has no real choice, consent is not freely given, and it will be invalid.

### **5. WHAT PERSONAL DATA WE COLLECT**

We will collect, store and process information about you if you voluntarily provide us with such information in connection with the following:

- a. Filling in a form on our Site for contacting inquiries.
- b. Filling in an application form for our services.
- c. Opting in to receive marketing information from us.
- d. Contacting us by email, telephone, via social media or face to face.
- e. If you send us your CV, resume, or other details of your employment history.
- f. Information we collect during our cooperation in conducting our legal due diligence.
- g. Information we receive from our Site (for example device information, log information, location, local storage, cookies etc.)



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## **6. HOW WE USE INFORMATION THAT WE COLLECT**

We may use your personal data to manage and operate our business and to provide our services to our Clients and/or Prospective Clients. We may also use your personal data to respond to your requests, always in the extent that the Law Firm is permitted to do so, or as required by the applicable laws, or in order to support any legal or criminal investigation process. To respond to our client's requests, we may keep a record of our communication to help solve any issues and/or concerns you may be facing and therefore communication with you by sending an email.

## **7. OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION**

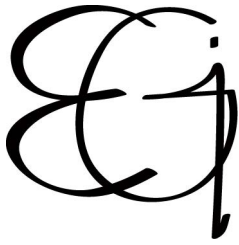
We process all personal data lawfully, fairly and in a transparent manner. We depend on the following legal basis in order to process your personal data:

- a. Where we have obtained your consent. Your consent can be withdrawn at any time, but it is important to note that we may still need to process or retain your data should the Law Firm need to comply with a legal obligation, i.e., for anti-money laundering purposes and or any other legal or criminal investigation, and when it is necessary to protect, exercise or defend our legal rights, or when we are required to do so by applicable law.
- b. Where it is necessary for the purposes of our legitimate interests to manage our existing course of business, i.e., conducting legal due diligence.
- c. Where it is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

## **8. YOUR RIGHTS UNDER GDPR**

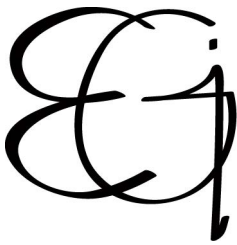
The full GDPR rights for individuals are the right to be informed, the right of access, the right to rectification, the right to erasure, the right to restrict processing, the right to data portability, the right to object and also rights around automated decision making and profiling.

- a. **The right to be informed:** You have the right to be informed about the collection and use of your personal data. The Law Firm shall provide you with information of the purpose of data processing, the retention period of your personal data, and who it will be shared with.
- b. **The right of access:** You have the right to access and receive a copy of your personal data and other supplementary information. The Law Firm shall reply to your request within a period of one month and may extend the time limit by a further two months if your request is complex. Your information shall be disclosed to you in a secure manner. It is to be noted that the Law Firm has the right to refuse to provide the information requested, if an exemption or restriction applies, or if the request is manifestly unfounded or excessive.



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- c. **The right to rectification:** You have the right to make a request for rectification/correction of your personal data, either verbally or in writing. The Law Firm shall respond to your request within one month.
- d. **The right to erasure:** You have the right to request the eraser of your personal data, either verbally or in writing. It is to be noted that the right is not absolute and shall only apply in certain circumstance as this may not apply for example; if the Law Firm has a legal obligation which requires by EU and/or Cyprus Law, to perform a task carried out in the public interest or in the exercise of official authority vested in the Law Firm; for reasons of public interest in the area of public health in accordance; for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes or for the establishment, exercise or defense of legal claims.
- e. **The right to restrict processing:** You have the right to obtain from the Law Firm restriction of processing, if one of the following applies: the accuracy of the personal data is contested by you for a period enabling us to verify the accuracy of the personal data; the processing is unlawful and you opposes the erasure of the personal data and requests the restriction of their use instead; We no longer need the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims; You have objected to processing and pending the verification whether the legitimate grounds of the Law Firm overrides those of the client. It is to be noted that where processing has been restricted for any of the reasons described above, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
- f. **The right to data portability:** You have the right to receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to data portability and gives you the right to receive back the personal data that you have provided, i.e. receive a copy of your personal data and/or have your personal data transmitted from one data controller to another controller.
- g. **The right to object:** You have the right to object on the grounds related to your particular situation at any time to processing of personal data concerning you i.e. you have the right to object to direct marketing. It is to be noted that this is the only right that is absolute.
- h. **Rights around automated decision making and profiling:** You have the right not be a subject to a decision solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affecting you.



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## **9. INFORMATION SECURITY**

Our Law Firm works hard to protect its Site and any information that held from unauthorized access or unauthorized alteration, disclosure, or destruction. We are devoted to reviewing our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.

## **10. WHAT ARE COOKIES?**

There are many types of cookies, including cookies that save your password, so you do not need to remember them whenever you visit a website, that verify your user login details, that show you targeted advertisement based on your browsing behavior, that remember what websites you have visited in the past.

Some cookies are necessary for a website to be fully functional. The GDPR gives website visitors the right to receive specific, up-to date information on what data is registered about them at all times, for what purpose, and where in the world it is sent, and this helps to identify browsing trends and patterns.

We may use various technologies to collect and store information when you visit our Site, and this may include using cookies or similar technologies to identify your browser or device. You may set your browser to block all cookies, including cookies associated with this Site or to indicate when a cookie is being set by us.

## **11. CHANGES**

Our Privacy Policy and/or procedures may change from time to time. If any changes occur, we will post these changes on Our Site to keep you updated at all times.

## **12. CONTACTING US**

Please submit any questions, concerns or comments you have about this Privacy Policy or any requests concerning your personal information by email to [info@ejgeo.com](mailto:info@ejgeo.com)