

# 228 ELYSIAN PROJECT ADVISORY LIMITED

## PRIVACY AND COOKIES POLICY

(ref: EP-8733 rev 0)

### 1. SCOPE OF THE PRIVACY NOTICE

1.1 228 ELYSIAN PROJECT ADVISORY LIMITED also "Elysian Project" and its subsidiaries (hereinafter the "Company") having a place of business at 11 Mesogeiou Street, Agia Fylaxi, Limassol, CY-3117 Cyprus, with tax registration number HE 431058 under the Cyprus Registrar.

1.1 The Company, in its capacity as Controller, collects and processes your personal data only if strictly necessary, for clear and legitimate purposes, under Regulation (EU) 2016/679, Cypriot Law 125(I)/2018 and Law 112(I)/2004, as applicable during the operation of its website www.orphicgroup.com (hereinafter referred to as the 'Website') on the processing of their personal data.

### 2. USEFUL DATA PRIVACY TERMS

2.1 For the purposes of this, the following terms are important to be defined:

- (A) personal data: any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified in particular by reference to an identifier such as a name, an identification number, location data, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- (B) personal data of special categories or sensitive personal data: personal information that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and genetic data, biometric data which allows to uniquely identify a natural person, health data and/or data regarding sexual orientation. We may collect such data only if you voluntarily provide us, or when we ask you to do so and you provide us your explicit consent.
- (C) minors' data: personal data of persons under the age of 18; We do not seek or obtain personal data directly from minors, instead we endeavor to collect such data from their legal guardian and when necessary, we obtain relevant consent, as it is analyzed hereinafter. However, as it is impossible to always determine the age of persons who access and use our Websites, we encourage parents or guardians to contact us if they notice any case of unauthorized data provision by minors in order to exercise accordingly their rights such as deletion of their data.
- (D) processing: any operation performed on personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- (E) controller: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;
- (F) processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller;
- (G) recipient: a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- (H) third party: 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 authorised to process personal data;

- (I) consent of the data subject: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he/she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him/her;
- (J) personal data breach: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- (K) Regulatory Framework: The relevant national and EU data protection regulatory framework, namely the Regulation (EU) 2016/679 (hereinafter referred to as the 'GDPR'); Law 125(I)/2018, Law 112(I)/2004, the jurisprudence of the Court of Justice of the European Union (hereinafter referred to as the CJEU) as well as the Decisions, Directives and Opinions of the European Data Protection Board (hereinafter referred to as the 'EDPB') and the Office of the Commissioner for Personal Data Protection (hereinafter referred to as the 'Commissioner').

### 3. DATA COLLECTED BY THE COMPANY THROUGH THE WEBSITE

3.1 When browsing and using the Website, the following are collected and processed:

Personal Data	Purpose	Legal Basis	Retention Period	Receivers
Full Name	Direct communication of the users with our Company	Article 6 (1)(f) – Provision of an easy and direct way of communication with the users	One (1) Year	Data Processors
Email				
Message				

### 4. DATA COLLECTED AUTOMATICALLY

4.1 When you use our Website, we collect data automatically, some of which can include personal data. These include data such as language settings, IP address, location, device settings, the operating system of the device, activity data, time of use, the referring URL, status report, user information (data on the browser version), the operating system, the browsing result (simple visitor or registered user), browsing history, the type of data you viewed. We can also collect data with the use of cookies. For information on the use of cookies, please refer to our Cookies Policy.

4.2 We do not perform automated decision-making processing, including profiling.

### 5. COLLECTION AND FURTHER PROCESSING OF MINORS PERSONAL DATA

5.1 In principle, the Company does not collect or further process data of minors directly or indirectly (example: persons who have not reached the age of 18). However, since it is impossible to cross-check and verify the age of persons entering or using the Company's Website, it is recommended that parents and guardians of minors contact the Company immediately if they find any unauthorized disclosure of data on behalf of the minors for whom they are responsible, in order to exercise respectively the rights granted to them, such as the deletion of their data. In case The Company Ltd realizes that it has collected personal data of a minor, the Company commits to delete them immediately and take every necessary measure for the protection of the minor's data.

### 6. COOKIES DATA OUTSIDE THE EEA

6.1 Cookie identification files are self-installed text files, with short content, stored on the user's computer or other electronic devices (example: mobile phones, tablets, etc.) that visit a website. In this

way, the Website remembers your actions and preferences (example: language, font size, and other visualization preferences) for a period of time, so you don't have to enter those preferences every time you visit the Website or browse from one page to another. Cookies help you navigate a more user-friendly environment.

6.2 There are two main categories of Cookies:

- (A) Temporary Cookies (session cookies, session cookies) that are deleted immediately after the end of the browser and/or after the closure of the browser,
- (B) Persistent Cookies, which remain in the browser for a certain period or until you delete them.

6.3 The Company, in the interest of better management of its Websites, uses both temporary and permanent Cookies. Each type of cookie we use serves different purposes. When you visit our Website, we may use the following cookies:

6.3.1 Technically Necessary Cookies - These cookies are essential for the proper functioning of the Website and allow you to browse and use its functions, such as access to secure areas. These cookies are necessary for the functioning of the Website and without them the provision of the services of the Website would not be technically possible.

6.3.2 Functionality Cookies - These cookies are used to store settings on the Website (example: by remembering your preferences regarding secure search, or to make it easier for you to browse the Website, and so on). The installation of these cookies is only possible if you provide your consent.

In the case of hyperlinks to other *websites*, the Website is not responsible for the terms of management and protection of personal data that they follow.

6.3.3 AD Cookies (Third Parties) - Information obtained through cookie technology is shared with third parties in the context of creating targeted advertising messages that may be displayed to the user during his visit to third party websites. Additionally, the relevant cookie technology allows for metrics related to user activity at another website that referred the user to our Websites. The installation of these cookies is only possible if you provide your consent.

6.3.4 Analysis Cookies (Third Parties) and other Technologies - These cookies collect information about the user of the Website and allow for an improvement in the way it works. This information helps the monitoring of the performance of the website, the measuring of visits, the monitoring of how you access the Website and so on. The installation of these cookies is only possible if you provide your consent.

6.3.5 Other Technologies - Other technologies may be used for the same purposes as cookies and allow us to know when the user visited the Website. Through them, the non-personal data (example: your operating system, your browser) or aggregated data can be collected and used to improve the user experience of the website. The installation of the mechanisms related to these technologies is only possible if you provide your consent.

6.3.6 Security Cookies (Third Parties) - These cookies may also be used for security purposes (example: prevention of cyber-attacks and any other malicious activity). These cookies are only installed if you give your consent.

6.3.7 Performance Cookies - These cookies collect information about your use of the Website, for instance: which pages you visit most often and if you receive error messages from the Website. These cookies do not collect information that identifies you since they collect them in an aggregated manner and, therefore, they remain anonymous. They are used only for statistical purposes that will help the improvement of the functioning of the Website. These cookies are installed only if you provide your consent.

6.4 If you wish to disable cookies, depending on their specific type, the Website may not work properly. Please note that "necessary" cookies cannot be disabled as they are necessary for the proper functioning of the website [www.orphicgroup.com](http://www.orphicgroup.com). For all the remaining types of cookies that are used by the Website, you can freely choose whether you prefer to use them or not when you first enter the

Website, while you always have the possibility to modify your choices for the use of cookies through the Cookie Banner.

6.5 In any case, you can always modify the options in your browser to receive notifications about the use of cookies or to reject the use of cookies. In this case, if you do not allow the use of cookies for certain services, you may not have any further access to them.

6.6 You can also revoke your consent to the use of cookies on your computer or other device by following the procedure for deleting them from the memory of your browser.

6.7 You can learn more information, according to your browser, by using the following links:

- (A) (Internet Explorer) <https://support.microsoft.com/help/17442/windows-internet-explorer-delete-manage-cookies>
- (B) (Mozilla Firefox) <http://support.mozilla.com/en-US/kb/Cookies>
- (C) (Google Chrome) <http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647>
- (D) (Safari) <http://support.apple.com/kb/PH5042>
- (E) (Opera) <http://www.opera.com/browser/tutorials/security/privacy/>
- (F) (Adobe (flashcookies)) <http://www.adobe.com/privacy/policies/flash-player.html>
- (G) To further learn about the types of cookies, please visit: [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **7. TRANSFER OF PERSONAL DATA OUTSIDE THE EEA**

In principle, the Company does not transmit your personal data to third countries. In case of transfer of your personal data to a country outside the European Economic Area (EEA), the Company carries out this transfer under Chapter II of the Regulation in conjunction with:

- (A) Adequacy Decision of the European Commission (Article 45 GDPR) or
- (B) Appropriate safeguards in accordance with the GDPR for the transmission of such data (Article 46 GDPR).
- (C) Finally, for occasional processing, the transfer is based on one of the exceptions provided for in Article 49 of the GDPR. (e.g. the explicit consent of the user and its information on the risks involved in the transfer, the transfer is necessary for the performance of a contract at the request of the subject, there are reasons in the public interest, necessary to support legal claims and vital interests of the data subject, etc.).

## **8. RETENTION PERIOD**

8.1 The personal data of the data subjects are collected and retained for a predetermined and limited period, depending on the purpose of processing, after which the data are deleted from our records.

8.2 Where the processing is imposed as an obligation by provisions of the applicable legal framework or a specific retention period is foreseen, your personal data will be stored for as long as the relevant provisions require.

8.3 The personal data of data subjects collected and processed for the performance of a contract shall be kept for as long as necessary for the performance of the contract and for the establishment, exercise, and/or support of legal claims based on the contract.

8.4 The personal data of the subjects that are processed for marketing purposes with the consent of the subjects (e.g. data from the subscription to the Newsletter) are kept until the revocation of the consent, without this revocation affecting the lawfulness of the processing until then.

## 9. BREACH OF PERSONAL DATA

9.1 In the event of a breach incident, the Company applies a specific Privacy Breach Incident Management Policy. If you become aware or suspect that a personal data breach may/has occurred, please inform the Company without delay either at the e-mail address [info@elysian-project.com](mailto:info@elysian-project.com).

## 10. YOUR RIGHTS

10.1 The Company ensures that it can respond directly to the requests of the subjects, for the exercise of their rights in accordance with the Regulatory Framework. More specifically, every data subject has the following rights:

Access	Rectification
Erasure	Restriction of Processing

10.2 In addition, he can request the portability/transmission of his personal data either to himself or to third parties and to withdraw at any time his consent he gave for the processing of his personal data, without such withdrawal affecting the legality of the processing until then.

10.3 Furthermore, the data subject is entitled to object to the processing of his personal data by the Company.

10.4 In case of exercise of any of the above rights, the Company will respond immediately [in any case within thirty (30) days of the submission of the request], informing you in writing of the progress of its satisfaction.

10.5 For any complaint you may make regarding this information note or privacy issues, if we do not meet your request, you may contact the Cypriot Office of the Commissioner for Personal Data Protection via the following link: <https://www.dataprotection.gov.cy/>.

## 11. DATA PROTECTION ISSUES

11.1 For the exercise of all the above rights, as well as for any matter relating to the processing of your personal data by the Company, you can contact us by e-mail [info@elysian-project.com](mailto:info@elysian-project.com).

## 12. DISCLAIMER FOR THIRD-PARTY WEBSITES SOCIAL MEDIA BUTTONS

12.1 On this Website social media buttons may be used – Social media widgets (example: Facebook, Instagram, Pinterest, YouTube, Twitter) using which, after the user logs on to the social network, creates a special digital footprint, for which both the Company and the social network itself act as joint controllers.

12.2 For the Company, the purpose of processing is to improve the functionality of the Website and the services provided as well as to analyze its traffic. The legal basis for the processing is the fulfilment of the Company's legitimate interest in linking its services with new technologies (GDPR Article 6(1)(f)).

12.3 The Company does not control or is responsible for any subsequent processing carried out on them by the Joint Managers.

12.4 For more information about data processing policy and options for setting up these networks, you can visit the following web pages, or such relevant pages as may be updated from time-to-time:

- (A) <https://www.facebook.com/privacy/explanation>
- (B) <https://help.instagram.com/519522125107875>
- (C) <https://policies.google.com/privacy?hl=el&fg=1>

- (D) [https://linkedin.com/legal/privacy-policy?trk=homepage-basic\\_footer-privacy-policy](https://linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy)
- (E) <https://twitter.com/en/privacy>
- (F) <https://policy.pinterest.com/en/privacy-policy>

12.5 You can change your choices for using cookies through the Cookie Banner.

### **13. UPDATES TO THE PRIVACY POLICY**

13.1 The Company may amend this Privacy and Cookies Policy from time to time for the purpose of complying with regulatory changes, changing business needs, or to satisfy the needs of our customers, properties, strategic marketing partners, and service providers. Updated versions will be uploaded to our Website and date marked so that you are always aware of when our Privacy Policy was last updated.

MAY 2023.

End of Privacy and Cookies Policy for 228 Elysian Project Advisory Limited website and mobile application.