

ANDREAS COUCOUNIS & CO LLC

PRIVACY STATEMENT

1. INTRODUCTION

This Privacy Statement sets out how ANDREAS COUCOUNIS & CO LLC (hereinafter called “the Law Firm”, “our Law Firm”, “we”) processes data, whether on individuals (including personal data in respect of individuals who are clients, job applicants, suppliers, prospective suppliers, summer intern applicants, trainee lawyer applicants, website visitors, contacts, office visitors, office staff, intermediaries or other third parties that the Law Firm interacts with, or any individual who is connected to those parties) or otherwise. Where the data held concerns individuals, this document also sets out the rights of those individuals in respect of that personal data.

This Privacy Statement is in line with the provisions of EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter called the “General Data Protection Regulation” and/or “GDPR”).

2. WHO WE ARE

The Law Firm is one of the oldest law firms in Cyprus, founded in 1970 by Andreas Coucounis, operating out of its Head Offices in Larnaca, and its offices in Nicosia and Paphos.

3. WHAT PERSONAL DATA DO WE HOLD?

“**Personal data**” is any information that relates to you and that identifies you either directly from that information or indirectly, by reference to other information that we have access to. The personal data that we collect, and how we collect it, depends upon how you interact with us. Categories of personal data that we collect include:

- Contact information such as name, email address and telephone number

Head Office 9, Arch. Makarios III Avenue, Lazaros Centre
Suites 101-102, P.O. Box 40519, 6305 Larnaca, Cyprus
T: 00-357-24822460, **F:** 00-357-24626106

Nicosia 1, Arch. Makarios III Avenue Mitsis Tower
Suite 205, 1065 Nicosia, Cyprus
T: 00-357-22460130, **F:** 00-357-22460133

Paphos 80, Tombs of the Kings Avenue, Office 1
P.O. Box 60368, 8102 Paphos, Cyprus
T: 00-357-26930236, **F:** 00-357-26930554

Κεντρικά Γραφεία Λεωφ. Αρχ. Μακαρίου Γ 9 Λάζαρος Σέντερ
Γρ. 101-102, Τ.Θ. 40519, 6305 Λάρνακα, Κύπρος
T: 00-357-24822460, **F:** 00-357-24626106

Λευκωσία Λεωφ. Αρχ. Μακαρίου Γ 1, Μέγαρο Μιτοιά
Γραφείο 205, 1065 Λευκωσία, Κύπρος
T: 00-357-22460130, **F:** 00-357-22460133

Πάφος Λεωφ. Τάφοι των Βασιλέων 80, Γραφείο 1
Τ.Θ. 60368, 8102 Πάφος, Κύπρος
T: 00-357-26930236, **F:** 00-357-26930554

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- Biographical information such as job title, employer, photograph and video or audio content including you
- Marketing, communication preferences and related information such as meal preferences, feedback and survey responses
- Billing and financial information such as billing address, bank account and payment information
- Services information such as details of services that we have purchased from you
- Special categories of data such as race and ethnicity, trade union membership, information about health or information, political opinions or religious beliefs
- Information relating to children or regarding criminal matters

The Law Firm processes personal data in the context of providing legal and other services to its clients. The categories of personal data it may collect and process, according to the particulars of each case, include:

- **Contact information**: Information such as your name, job title, postal address, home address where you provide this to us, business address, telephone numbers, mobile numbers, Skype address, fax number and email addresses.
- **Payment data & financial information**: Data necessary for us to process payments and implement fraud prevention measures, including credit/debit card numbers, bank account details, VAT Numbers, Tax Identification Numbers, security code numbers and other such relevant billing details.
- **Business details**: Business information which we necessarily process as part of our instructions or projects we are involved in or otherwise provided by you voluntarily.
- **Compliance details**: Information we are legally required to collect for compliance purposes, such as ‘know your client’ information, details relevant to international sanctions and restrictive measures and information about relevant and significant litigation, which may impact our ability to act. Furthermore, information required by the Law Firm to meet legal and regulatory requirements, in particular in respect of anti-money laundering legislation, including information on source of funds and source of wealth.
- **On-going information**: information provided in the course of the provision of legal and other services (for example, information on professional relationships and background, financial wealth and assets held, transactions entered into, tax status, disputes and court proceedings engaged in).
- **Physical Presence**: meetings attended and visits to the Law Firm’s offices & audiovisual content.
- **Preferences**: Information about your preferences, where it is relevant to the services we provide.

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- **Publicly available information:** Information collected from publicly available resources, including but not limited to information collected from databases we use to carry out compliance checks or credit rating agencies.
- **Statutory Register Information:** Information about you on account of an interest or office you may hold in or certain relationships you may have with a corporate entity, partnership, trust or other vehicle to which we provide services (each such entity, a Third-Party Entity).
- **Details for events:** In some cases, we may collect information about you, which may include sensitive information in relation to your health, for the purpose of tailoring our events to your needs. The processing of such data is based entirely on your consent-in the event that you do not want us to maintain such data, we may not be able to take the necessary precautions.
- **General:** any other information you may provide to the Law Firm.

5. PERSONAL DATA WE COLLECT FROM YOU

We collect personal data directly from you, for example, as follows:

- When you sign up to receive news services, use a toolkit or register for one of our online services, we will ask you provide your contact and other relevant information, as well as your communication preferences.
- When you register to attend one of our events, we will ask you to provide your contact, guest and other relevant information including meal preferences.
- When you use our website or one of our online services we collect information about your visit and how you interact with our website.
- When a client uses our legal services, we will ask for the information that we need to provide those services; this information includes contact details, billing information, information necessary to conduct pre-clearance checks, all information about your case and information relevant to the services we provide. Information provided by a client may include personal data that relates to persons whose information is relevant to the instruction; for example, when we advise on a business transaction or a regulatory investigation or represent a client in a legal dispute.
- When you apply for a job or a traineeship position or a summer intern position or any other position at our Law Firm, we will ask you for information relevant to your application.
- If you visit one of our buildings we may collect information that we need in order to identify you and complete necessary security checks. We may also collect your image and voice on CCTV or on our telephone system during your visit to our Law Firm's premises or during our telephone conversations in providing our services or in addressing and handling any issue whatsoever.

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- If you provide information to us about another person, you must ensure that you comply with any legal obligations that may apply to your provision of the information to us, and to allow us, where necessary, to share that information with our service providers.
- When you or your organisation seek our services – i.e. legal advice or our fiduciary services;
- When you or your organisation make an enquiry through our website, in person, over email or over the telephone;
- When you attend one of our seminars or other events we may organise, or sign up to receive communications from us, including training;
- When you or your organisation provide services to us, or otherwise offer to do so.
- In some circumstances, we may collect personal data about you from third parties, for example, we may collect personal data from your organisation, other organisations with whom you have dealings, including government agencies, a credit reporting agency, an information or service provider or from a publicly available record, regulatory bodies, credit reference agencies, our clients, other companies providing services to us. We may also collect data from publicly available sources of information. We may also receive information about you from various internet search engines. When you visit our website we may automatically collect, store and use technical information about your equipment and interaction with our website; this information is sent from your computer, smartphone, tablet or other device used to surf on the internet to us using a variety of cookies.

6. HOW WE USE PERSONAL DATA WE COLLECT FROM YOU

We will only use your personal data fairly and where we have a lawful reason to do so.

We are allowed to use your personal data if we have your consent or another legally permitted reason applies. These include to fulfil a contract with you, when we have a legal duty to comply with, or when it is in our legitimate business interest to use your personal data. We can only rely on our legitimate business interest, if it is fair and reasonable to do so.

Our use of your personal data depends on how and where you interact with us. See below a list of the ways that we use your personal data, and which of the reasons we rely on to do so.

We will only process special category data where the processing is necessary for the purposes of providing our client with advice regarding obligations or an individual with advice regarding their rights in the field of employment or social security; or where it is necessary to do so in order to establish, exercise or defend legal claims.

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If it becomes necessary that the Law Firm has to take action against you for any reason whatsoever, including but not limited to recovering from you any money you owe to the Law Firm, you expressly agree that the personal data provided by you can be relied upon in identifying and taking legal action against you.

INDICATIVE LIST

USES OF PERSONAL DATA	OUR LAWFUL BASIS FOR THE USE OF YOUR PERSONAL DATA
To provide news and information services including email briefings and newsletters; to give access to online tools and to invite you to events that we and our partners organise.	Where you have consented and expressed a preference to receive such marketing communications; or where it is appropriate and relevant to our business relationship with you.
To send you details of surveys, campaigns or other initiatives that we co-ordinate.	Where you have consented and expressed a preference to receive such marketing communications; or where it is appropriate and relevant to our business relationship with you.
To operate suppression lists to ensure that you do not receive communications if you object or unsubscribe.	To respect your rights and comply with our legal obligations.
To collect insights into how you interact with our services so that we can personalise our communications with you and improve our website and services.	Where we have your consent or where it is necessary so that we can deliver our website and online services effectively.
To maintain contact with past employees, past trainees, past summer interns and past clients.	To promote networking and communication with and between Andreas Coucounis & Co LLC and its former employees, trainees, summer interns and clients.

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To conduct client due diligence and conflict checks when on-boarding a new client.	To comply with our legal and regulatory obligations including compliance with anti-money laundering legislation, fraud and crime prevention.
To provide legal advice and related relevant services, to manage and administer our business relationships, including to communicate with our clients, their employees and representatives, to manage billing and payments and to keep records.	To fulfil our contract with our client(s) and to comply with legal and regulatory obligations including accounting, tax and data privacy.
To maintain security and manage access to our offices, systems and our website.	To comply with legal obligations, and because we have a legitimate interest in maintaining the security of our buildings, website and networks.
Enforcing our terms of engagement, website terms of use and other terms and conditions.	To protect our legal interests.
Sharing personal data in connection with acquisitions and transfers of our business.	To comply with legal obligations and to facilitate the transaction.
To manage our supply chain including identifying and maintaining contact with service providers.	Where necessary for the efficient running of our business.
Other purposes that we have identified at the point of collection.	Where we have your consent.

7. SHARING AND TRANSFERRING YOUR PERSONAL DATA

We treat your personal data with respect and do not share it with third parties except as described below:

- We may disclose your personal data to other entities connected to the Law Firm for the purpose of our internal business processes (such as administration and billing) and for the purpose of providing legal advice and services.

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- Where it is necessary to transfer data from us to anywhere outside of the EU and EEA, we will comply with any transfer requirements applicable under local law.
- We may disclose personal data relating to our clients, their employees and agents to other legal specialists, including mediators, arbitrators, consultants or experts engaged in a matter. We may also disclose personal data to third party law firms for the purpose of obtaining foreign legal advice.
- We may share personal data with our suppliers and service providers including event organisers and partners and document production and management services
- We may share personal information when necessary with law enforcement and regulatory authorities.
- We may also share your personal data when you have consented to us doing so.
- The following is a list of potential recipients of data (in each case including respective employees, directors and officers):
 1. employees of the Law Firm who are acquainted with the GDPR and have signed up to the Law Firm's confidentiality policy;
 2. other service providers (legal, governance or otherwise, including any bank or financial institution providing services in relation to any matter on which the Law Firm is instructed) where disclosure to that provider of services is considered necessary to fulfil the purposes set out above;
 3. any sub-contractors, agents or service providers of the Law Firm;
 4. courts or tribunals;
 5. third parties with whom the Law Firm engages for the hosting of events or other marketing initiatives;
 6. law enforcement agencies where considered necessary for the Law Firm to fulfil legal obligations applicable to it;
 7. court bailiffs or private bailiffs;
 8. regulators or other governmental or supervisory bodies with a legal right to the material or a legitimate interest in any material;
 9. any registrar of a public register where the data is to be included in a public registry.
 10. the recipient has agreed through contract to protect the information in the same Data Protection standards as the European Union;

8. KEEPING YOUR PERSONAL DATA

We do not keep your personal data for any longer than is necessary to fulfil the purpose for which we collected it, or to comply with any legal, regulatory or reporting obligations or to assert or defend against legal claims.

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9. YOUR RIGHTS REGARDING YOUR PERSONAL DATA

You have certain rights regarding how we use and keep your personal data. These are:

- you can require us, to update or correct any inaccurate personal data, or to complete any incomplete personal data, concerning you. If you do, we will take reasonable steps to check the accuracy of and correct the information. Please let us know if any of your information changes so that we can keep it accurate and up to date;
- you can require us to stop processing your information for direct marketing purposes; if you withdraw your consent, we may not be able to provide certain products or services to you; and
- you have the right to object to our use of your personal data more generally.
- You may also have the right, in certain circumstances to:
 - be provided with a copy of any personal data that we hold about you, with certain related information. There are exceptions to this right; for example, where information is legally privileged or if providing you with the information would reveal personal data about another person;
 - to require us, without undue delay, to delete your personal data;
 - to "restrict" our use of your information, so that it can only continue subject to restrictions; and
 - to require personal data which you have provided to us and which are processed by using automated means, based on your consent or the performance of a contract with you, to be provided to you in machine readable format so that they can be "ported" to a replacement service provider.

You can exercise the above rights, where applicable by contacting us at info@coucounis.com

We will require you to provide satisfactory proof of your identity in order to ensure that your rights are respected and protected. This is to ensure that your personal data is disclosed only to you.

10. AMENDMENTS TO THIS PRIVACY STATEMENT/COMPLAINTS

We keep this Privacy Statement under review in order to ensure that it is in line with any changes to the laws relating to privacy and personal data. Any updates will appear on the Law Firm's website.

This Privacy Statement is governed by Cyprus law.

This Privacy Statement was last updated on 24th May 2018.

For any complaints please contact us at info@coucounis.com