

PRIVACY STATEMENT AND POLICY

2020

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 “Earico Investments Limited” is a reference to, and to any member of Earico. Earico 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 Earico Investments Limited with its legal obligations under any applicable laws. 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 Earico Investments Limited which may be situated outside of the Republic of Cyprus and/or the European Union and engaged by Earico Investments Limited 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, Earico Investments Limited 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 Earico Investments Limited 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 akamantis@akamantis.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 akamantis@akamantis.com, telephone number: 00357 22676797.



Contact Details: Earico Investments Limited, 10 Egypt Street, P.C. 1097, Nicosia, Cyprus, email:

akamantis@akamantis.com , website: www.akamantis.com

If, for any reason, you believe that Earico Investments Limited 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.

Earico Investments Limited.

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