

Privacy Notice

Prudens Ltd respects your privacy and is strongly committed to protecting personal data. This privacy notice describes why and how we collect and process personal data and provides information about individuals' rights under the Protection of Natural Persons Regarding the Processing of their Personal Data and the Free Movement of such Data Law 125(I) of 2018 as amend from time to time and the EU General Data Protection Regulation ("GDPR") 2016/679. It applies to personal data provided to us, both by individuals themselves or by others who are current or potential clients or are authorized representatives/agents or beneficial owners of legal entities or natural persons or had contractual or other legal relationship with the Company in the past. We may use personal data provided to us for any of the purposes described in this privacy notice or as otherwise stated at the point of collection.

Where necessary to enable Prudens Ltd to deliver the Services under this engagement letter, you may provide us with, or we may have access to, information relating to an identified or identifiable individual ('personal data') where it is strictly needed for those purposes.

Collection of personal data:

1. Personal data, or personal information, means any information about an individual from which that person can be identified.
2. Given the diversity of the services we provide to clients, we may process many categories of personal data. Therefore, if you are a prospective client, or a non-client counterparty in a transaction of a client or an authorised representative/agent or beneficial owner of a legal entity or of a natural person which/who is a prospective client, the relevant personal data which we collect may include:
 - a) **Personal details** (e.g. first name/maiden name/last name, age/date of birth, gender, marital status, country of residence, nationality);
 - b) **Contact details** (e.g. email address, contact numbers, postal address, residential or business address);
 - c) **Financial details** (e.g. salary, banking details, payroll details and other financial-related details such as income, investments and other financial interests, benefits, tax status);
 - d) **Job details** (e.g. employed/self-employed, position, grade, educational background, performance information and other information about management and employees).
 - e) if you hold/held a prominent public function (for PEPs), FATCA / CRS info, authentication data (e.g. signature).
 - f) **Children's data:** We understand the importance of protecting children's privacy. We may collect personal data in relation to children for providing immigration services, only provided that we have first obtained their parents' or legal guardian's consent or unless otherwise permitted under the law.
3. For certain services or activities, we may process special categories of personal data, such as, in performing know your client checks (KYC) and providing immigration and tax services, which involve us processing government identification documents that may contain biometric data or data revealing racial or ethnic origin.

4. Generally, we collect personal data from our clients or from a third party acting on the instructions of the relevant client and/or arising from our contractual relationship.

If you fail to provide personal data:

To enter into a contractual relationship with you, you must provide us with your personal data, which is necessary for the required commencement and execution of our contractual obligations. We are furthermore obligated to collect such personal data given the provisions of the money laundering law, which require that we verify your identity before we enter into a contract or a business relationship with you or the legal entity for which you are the authorised representative/agent or beneficial owner.

Please note that if you fail to provide us with the required data, then then we will not be allowed to commence or continue our contractual obligations with yourself but we will notify you if this is the case at the time.

Purpose of processing of personal data:

1. In making personal data available to us, you confirm that you have complied with applicable data protection laws and regulations in relation to the personal data.
2. Due to the nature of the Services as described in the Engagement Letter or with your consent we determine the purpose and means of all or any of the processing of personal data we will comply with applicable Data Protection Laws when we do so.
3. Personal data may be processed in compliance to the obligations imposed on us to obtain information about clients as well as individuals related with clients and client company/ies/trust structures. The purpose of that is to combat money laundering/terrorist financing and to comply with tax reporting requirements, including those concerned with US Foreign Account Tax Compliance Act (FATCA), the Common Reporting Standard (CRS) and/or other applicable European and/or Cyprus Legislation. In holding and processing your personal information, we also comply with legislation of the Protection of Natural Persons Regarding the Processing of their Personal Data and the Free Movement of such Data Law 125(I) of 2018 as amended from time to time.
4. Most commonly, we will use your personal data in accordance with the GDPR and the local data protection law for one or more of the following reasons.
 - Where we need to perform the contract we are about to enter into or have entered into with you.
 - Where it is necessary that our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; we process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. Examples of such processing activities include, initiating legal claims and preparing our defence in litigation procedures and/or measures to manage business and for further developing services, sharing your personal data within Prudens Group for the purpose of updating/verifying your personal data in

accordance with the relevant anti-money laundering compliance framework and/or for the performance of the services.

- Where we need to comply with a legal or regulatory obligation; there are a number of legal obligations emanating from the relevant laws to which we are subject as well as statutory requirements, e.g., the Cyprus Banking Law, the Money Laundering Law, the Cyprus Investment Services Law, Tax Laws. There are also various supervisory authorities whose laws and regulations we are subject to such as the Cyprus Bar Association. Such obligations and requirements are imposed on us for personal data processing activities for identity verification, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls. To comply with applicable AML/CFT measures by assessing the risks involved, we need to carry out checks in order to prevent money laundering, fraud and to combat international terrorism.
- Promoting the best interest of the client.
- Where disclosure is necessary for the relevant tax authorities, auditors and/or reporting accountants, to perform their respective services.
- You have provided your consent; Provided that you have given us your specific consent for processing (other than for the reasons set out above) then the lawfulness of such processing is based on that consent. You have the right to revoke consent at any time. However, any processing of personal data prior to the receipt of your revocation will not be affected.

CHANGE OF PURPOSE: We will only use your personal data for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at: dpo@prudensgroup.com.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis, which allows us to do so

When, how and with whom we share personal data:

1. We provide a diverse range of professional services some of our services require us to process personal data in order to provide advice and deliverables.
2. In the course of the performance of our contractual and statutory obligations, your personal data may be provided to different departments within Prudens Ltd but also to other companies of the Prudens Group and/or third party/ies providing service/s to and/or acting as agents of Prudens and/or to any subsidiary and/or affiliate company/ies of Prudens for the purposes and/or in the context of the provision of our services.

Consequently, other service providers and suppliers may also receive your personal data so that we may perform our services and/or legal obligations. Such service providers and suppliers enter into contractual agreements with us by which they observe confidentiality and data protection according to the data protection law and GDPR.

3. It must be noted that we may disclose data about you for any of the reasons set out hereinabove, or if we are legally required to do so, or if we are authorised under our contractual and statutory obligations or if you have given your consent. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We strictly prohibit our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. We only provide the necessary information they need to perform their specific services.
4. Only disclose personal data to Authorised Personnel to the extent that they have a need to know for the purpose of providing the Services and are subject to appropriate obligations of confidentiality.
5. Under the circumstances referred to above, recipients of personal data may be administrative purposes, for example: income tax authorities, criminal prosecution authorities, the Cyprus Bar Association, auditors and accountants, legal consultants and external legal consultants, service providers, suppliers, share and stock investment and management companies, agents, business partners, valuers and surveyors, financial and business advisors, archiving and/or records management companies, registrar, delivery couriers, IT companies who support our website and other business systems and so on.
6. We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems/Softwares. For example, providers of information technology and maintenance:

Name	Role	Address
eBOS Technologies Ltd -WiseBOS ¹	Software-organisation management time recording. Billing and secretarial operations. – on-prem software	eBOS Tower, Arch. Makariou III & Mesaorias 1 Office 101, 2322 Lakatamia Nicosia, Cyprus
E.C.S E- Soft Business Software Ltd	Pay-roll, accounting system, Invoicing services –on-prem software	24 Pireos St., 3rd Floor, Office 301, 2023 Strovolos P.O.Box.16231,2087 Nicosia, Cyprus

7. NOTE THAT we will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place as appropriate to protect the data and to comply with our data protection, confidentiality and security standards.

¹ As of September 2022

Clients' Rights:

1. Clients' have certain rights over their personal data and controllers are responsible for fulfilling these rights.
2. Clients' rights may include the right of access to personal data, to rectification of personal data, to erasure of personal data / right to be forgotten, to restrict processing of personal data, to object to processing of personal data, to data portability, the right to withdraw consent at any time (where processing is based on consent) and the right to lodge a complaint with a supervisory authority.
3. Please see further information about these rights, when they are available and how to exercise them below:

a) Your right of access to personal data

You have the right to obtain confirmation as to whether or not we process personal data about you, receive a copy of this personal data held by us and obtain certain other information about how and why we process your personal data (similar to the information provided in this privacy notice). This right may be exercised by emailing us at dpo@prudensgroup.com. We aim to respond to any requests for information promptly, and in any event within the legally required time limits.

b) Your right to rectification / amendment of personal data

You have the right to request for amendment or rectification of your personal data where it is inaccurate (for example, if you change your name or address) and to have incomplete personal data completed.

To update personal data submitted to us, you may email us at dpo@prudensgroup.com.

c) Your right to erasure / right to be forgotten

You have the right to obtain deletion of your personal data in the following cases:

- the personal data are no longer necessary in relation to the purposes for which they were collected and processed;
- our legal grounds for processing is consent, you withdraw consent and we have no other lawful basis for the processing;
- our legal grounds for processing is that the processing is necessary for legitimate interests pursued by us or a third party, you object to our processing and we do not have overriding legitimate grounds;
- your personal data have been unlawfully processed; or
- your personal data must be erased to comply with a legal obligation to which we are subject.

To request deletion of your personal data, please email us at dpo@prudensgroup.com.

d) Your right to restrict processing

You have the right to restrict our processing of your personal data in the following cases:

- for a period enabling us to verify the accuracy of your personal data where you have contested the accuracy of the personal data;
- your personal data have been unlawfully processed and you request restriction of processing instead of deletion;
- your personal data are no longer necessary in relation to the purposes for which they were collected and processed but the personal data are required by you to establish, exercise or defend legal claims; or
- for a period enabling us to verify whether the legitimate grounds relied on by us override your interests where you have objected to processing based on it being necessary for the pursuit of a legitimate interest identified by us.

To restrict our processing of your personal data, please email us at dpo@prudensgroup.com.

e) Your right to object to processing

You have the right to object to our processing of your personal data in the following cases:

- our legal grounds for processing is that the processing is necessary for a legitimate interest pursued by us or a third party; or
- our processing is for direct marketing purposes.

To object to our processing of your personal data, please email us at dpo@prudensgroup.com.

f) Your right to data portability

You have a right to receive your personal data provided by you to us and have the right to send the data to another organisation (or ask us to do so if technically feasible) where our lawful basis for processing the personal data is consent or necessity for the performance of our contract with you and the processing is carried out by automated means.

To exercise your right to data portability, please email us at dpo@prudensgroup.com.

g) Your right to withdraw consent

Where we process personal data based on consent, individuals have a right to withdraw consent at any time. We do not generally process personal data based on consent (as we can usually rely on another legal basis). Where we rely on your consent for our processing of personal data, to withdraw your consent, please email us at dpo@prudensgroup.com.

h) Complaints

You have the right to lodge a complaint with the supervisory authority in your country of residence, place of work or the country in which an alleged infringement of data protection law has occurred within the EU. The Office of the Commissioner for Personal Data Protection is the Cyprus data protection regulator/supervisory authority. For further information on your rights and how to complain to the Office of the Commissioner for Personal Data Protection, please refer to their website.

We hope that you won't ever need to, but if you do want to complain about our use of personal data, we would appreciate the chance to address your queries, so please contact us at dpo@prudensgroup.com. We will look into and respond to any complaints/queries we receive.

Data security:

Appropriate security measures have been put in place, in order to prevent your personal data from being accidentally lost, misuse, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to employees, agents, contractors and other third parties. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Procedures have been put in place, to deal with any suspected personal data breach and (as defined by applicable Data Protection Law) we will notify you and the commissioner without undue delay upon becoming aware of it

Data retention:

1. We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).
2. In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for records and other documentary evidence created in the provision of services is ten (10) years.
3. Personal data may be held for longer periods where extended retention periods are required by law or regulation and in order to establish, exercise or defend our legal rights.
4. Upon termination or expiry of this engagement, and the passing of ten (10) years we could promptly return the data provided to you or, if requested by you, destroy all copies of the personal data, in which case any right to use, copy or disclose that personal data ceases.

Changes to this privacy notice

We recognise that transparency is an ongoing responsibility so we will keep this privacy notice under regular review.

We will notify you appropriately when we make amendments to this privacy notice and we will amend the revision date stated below. You may also review the privacy notice published on our website periodically so as to be always informed about how we are processing and protecting your personal information

Copy of this privacy notice is available on our website and is provided with the engagement letter.

This notice was last updated on 28 February 2019.