

## Privacy Policy

**Pamboridis LLC** ("Pamboridis LLC", "we" "us" or "our") values your privacy and is committed to protect all personal data it collects in accordance with the provisions of the EU General Data Protection Regulation (GDPR) and the Cyprus personal data laws and regulations.

This privacy policy (the "Privacy Policy") is addressed to you ("you", "your" or "yours") who provide personal data to us when:

- you are interested in becoming our client
- you are our client and engaged with us to be provided with legal or administrative/nominee services
- you contact us via telephone or email to seek legal or administrative/nominee services from us
- you offer to provide or provide goods or services to us (supplier or service provider)
- you enter our premises

It is important that you read this Privacy Policy carefully. By visiting this Website and by completing and submitting the web-forms uploaded in the Website, you are deemed to have read and understood this Privacy Policy. If you choose not to provide any personal data requested we may not be in a position to respond to your queries, process your application for employment or provide full functionality of the Website.

This Privacy Policy should be read together with the [Terms of Business](#).

## Who is responsible for your Personal Data (Data Controller)

Depending on the nature of the services you request and the purpose of processing, the data controller having the responsibility of the collection, management, handling and processing of your personal data might be:

- **Pamboridis LLC**, a lawyers' limited company incorporated under the laws of the Republic of Cyprus and regulated by the Cyprus Bar Association, providing legal services
- **Pandalaw Management Limited**, a limited liability company incorporated under the laws of the Republic of Cyprus, providing administrative and nominee services such as (a) nominee shareholders (b) nominee directors and (c) company secretary.
- **Pandalaw Services Limited**, a limited liability company incorporated under the laws of the Republic of Cyprus, administrative and nominee services such as (a) nominee shareholders (b) nominee directors and (c) company secretary.
- **GP Law Limited**, a limited liability company incorporated under the laws of the Republic of Cyprus, administrative and nominee services such as (a) nominee shareholders (b) nominee directors and (c) company secretary.

You can contact us at:

Address: Pamboridis House, 45 Digeni Akrita Avenue, CY-1070, Nicosia, Cyprus

Email: [info@pamboridis.com](mailto:info@pamboridis.com)

Tel: +357 22 75 25 25

## What Personal Data we collect

### When you are interested in becoming our client

Pamboridis LLC together with its wholly owned subsidiaries namely Pandalaw Management Limited, Pandalaw Services Limited and GP Law Limited are regulated and supervised entities under the Cyprus Bar Association with regards to Anti-Money Laundering and Counter - Terrorist Financing (AML/CTF) and as such we are obliged, prior to entering into any engagement, contract or business relationship with you or the legal entity, for which you are the beneficial owner, shareholder, director or authorized representative - agent - contact person, to verify your identity pursuant to the Cyprus AML/CTF laws and regulations and to complete our internal clients' acceptance policy to include conducting appropriate Due Diligence and Know-Your-Client procedures. If you do not provide us with the required personal data, then we will not be allowed to commence or continue our business relationship either to you as individual or to the legal entity to which you are the beneficial owner, shareholder, director or authorized representative - agent - contact person.

For the above purpose we may collect and process various personal data, including:

- Information to verify you identity (identify you) (e.g. Passport/ID)
- Information about you (e.g. name, middle name, surname, date and place of birth, nationality, marital status, residential address)
- Information to contact you (e.g. residence/correspondence/business address, residence/work/mobile number, fax number, email address)
- Education and Profession (e.g. profession and current occupation, CV, employer name, years of employment, current position, nature of work)
- Financial information (e.g. your income and source of income, source of wealth (name and type/nature of business, type of investments and annual sales/income), value of inheritance, value of assets)
- Criminal convictions (e.g. convictions for offence, sanctions)
- Other information (e.g. if you hold/held a Prominent Public Function (PEP), proof of address e.g. utility bills, reference letters, tax and social insurance numbers, bank account details)
- Specimen signature
- Correspondence with you or third parties about you

We keep manual or electronic filing systems in which we store your personal data, including any sensitive personal data, submitted or to be submitted during our ongoing business relationship. Depending on your circumstances, during our clients' acceptance procedures and in regular periods during our business relationship (in order to confirm your data for fraud and money laundering prevention purposes) we shall collect and store copy of your passport and/or ID and proof of residence documents.

### **When you are our client and engaged with us to be provided with legal or administrative/nominee services**

Depending on your instructions and the nature of the services we will provide to you, we may collect and process various personal data, including:

- Information about you (e.g. name, surname, job title, profession/occupation, place of work)
- Information to contact you (e.g. residence/correspondence address, residence/work/mobile number, email address)
- Financial information (e.g. bank account details, beneficiaries, VAT registration number and other related invoicing information)
- Information that you provide to us as part of us providing our services which is necessary for a project or a client contractual relationship with us or voluntarily provided by you (e.g. instructions given, engagement letters, payments, requests that you address to us, information provided and notes taken via telecom or online or physical meetings)
- Correspondence with you or third parties about you
- Updated information mentioned above for our ongoing Due Diligence and Know-Your-Client procedures

### **When you contact us via telephone or email to seek legal or administrative/nominee services**

- Information about you (e.g. name, surname, place of work)
- Information to contact you (e.g. residence/work/mobile number and email address)

### **When you offer to provide or provide goods or services to us (supplier or service provider)**

- Information about you (e.g. name, surname, job title, profession/occupation, place of work)
- Information to contact you (e.g. correspondence address, work/mobile number, email address)
- Our agreement(s) with you
- Financial information to make payments to you (e.g. bank account details, beneficiaries, VAT registration number and other related invoicing information)
- Business relationship information (e.g. recorded instructions given to you under our agreement(s) with you and correspondence)
- Other information necessary for managing our business relationship

## When you enter our premises

- Information about you (e.g. name, surname, place of work)
- Details of your visit to our premises (e.g. date and time of your entry / exit of the building)
- CCTV footage data:

Pamboridis LLC has legally installed CCTV (Closed Circuit TeleVision) Surveillance Cameras at specific places outside and inside the building which record only images (not sound), therefore your image may be recorded by CCTVs when you pass from those places.

CCTVs are installed outside the building and focusing at the entry point of the main entrance door of the building and the driveway areas next to the building. CCTVs are installed inside the building focusing at the exit point of the main entrance door of the building, at the entry/exit point of the door of the entrance to the reception area, at the entry/exit point of the door next to the conferences and on each floor focusing at the elevator. At the main entrance of the building, the entrance to the reception area and in the elevator there is an “on-the-spot” clearly visible notice about the CCTV surveillance activity.

CCTVs location and positioning are such that they are not intended to cover the external surrounding public area/space of the building and are placed in a way that only people accessing such facilities are recorded and focusing on the space they intend to protect. The aim of the CCTVs is to give a general overview of what’s happening in certain places but not necessarily to recognize persons. It is important to note that the CCTVs installed do not focus at offices, desks, waiting area, conference rooms or outside WC.

## General

We may request and process additional personal data, provided always that we are legally entitled do so. If we ask you to provide any other personal data not described above, then the personal data we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the time we collect it.

In connection with the provision of our services to you we may on certain occasions need to ask for special categories of personal data (sensitive data) such as information about your health, disability or ethnicity. If we collect any sensitive personal data from you to use it for reasons other than based on the exceptions provided under the GDPR, we will obtain your explicit consent prior to the collection. You have the right to revoke your consent at any time however any processing prior to the receipt of such revocation will not be affected.

If you intend to provide us with personal data about other individuals you must provide a copy of this Privacy Policy directly to them.

## The purposes of processing your Personal Data

### What legal bases we use

#### When you are interested in becoming our client

- for allowing us to contact you
- for complying with our obligations under applicable Anti-Money Laundering and Counter-Terrorist Financing (AML/CTF) laws and regulations
- for adhering to our internal clients' acceptance policy to include conducting appropriate Due Diligence and Know-Your-Client procedures

The processing is partly based on our legitimate interest (Article 6 (1) (f) GDPR) and partly necessary for complying with our ongoing legal obligations (Article 6 (1) (c) GDPR)

#### When you are our client and engaged with us to be provided with legal or administrative/nominee services

- for allowing us to contact you
- for responding to your enquiries and other requests for legal or administrative/nominee services
- for providing our legal or administrative/nominee services you have requested
- for performing our contractual obligations under our engagement or services agreement with you or take steps at your request prior to entering into such agreement or engagement
- for complying with court orders
- for defending/enforcing our legal rights (where applicable)
- for any purposes ancillary or related to the above purposes

The processing is partly based on our legitimate interest (Article 6 (1) (f) GDPR) and partly necessary for the performance of a contract to which you are a party, or to take steps at your request prior to entering into a contract or generally in the context of any other dealings we may have with you (Article 6 (1) (b) GDPR)

#### When you contact us via telephone or email to seek legal or administrative/nominee services

- for allowing us to contact you
- for responding to your enquiries and other requests for legal or administrative/nominee services

The processing is partly based on our legitimate interest (Article 6 (1) (f) GDPR) and partly necessary for the performance of a contract to which you are a party, or to take steps at your request prior to entering into a contract or generally in the context of any other dealings we may have with you (Article 6 (1) (b) GDPR)

#### When you offer to provide or provide goods or services to us (supplier or service provider)

- for allowing us to contact you

- for performing our contractual obligations under our services agreement with you or take steps at your request prior to entering into such agreement or engagement
- for making payments to you
- for defending/enforcing our legal rights (where applicable)
- for any purposes ancillary or related to the above purposes

The processing is partly based on our legitimate interest (Article 6 (1) (f) GDPR) and partly necessary for the performance of a contract to which you are a party, or to take steps at your request prior to entering into a contract or generally in the context of any other dealings we may have with you (Article 6 (1) (b) GDPR)

### **When you enter our premises**

- for controlling the access to and ensuring the security and safety of Pamboridis LLC property, including, our building, as well as information located or stored in our premises
- for protecting, securing and ensuring the safety of Pamboridis LLC employees and all visitors entering our premises
- to prevent, deter and, if necessary, investigate unauthorised physical access, including unauthorised access to secured premises and protected rooms, IT infrastructure or confidential and other information
- to prevent, deter and, if necessary, investigate a theft of equipment or assets owned by Pamboridis LLC, visitors or personnel or threats to safety of personnel or other persons working at our offices

The processing is based on our legitimate interest (Article 6 (1) (f) GDPR)

## **From where we collect your Personal Data**

### **When you are interested in becoming our client**

- directly from you or your authorised representatives – agents – contact persons - employees
- from the completion of our Due Diligence and Know-Your-Client questionnaire and the documentation you submit in this regard
- from publicly available or other sources such as the Department of Registrar of Companies & Intellectual Property, the Land Registry, the Tax Department, the Social Insurance Department, the Civil Registry & Migration Department, Credit Reference Data Agencies (e.g. World Compliance), the Press, the Media and the Internet in general

### **When you are our client and engaged with us to be provided with legal or administrative/nominee services**

We collect and process the personal data that have been directly submitted with us by you or by third parties such as your authorised representatives – agents – contact persons – employees, from the updated documentation you submit with regard to our ongoing Due Diligence and Know-Your-Client procedures and from other third parties e.g. companies or individuals that introduce you to us

**When you contact us via telephone or email to seek legal or administrative/nominee services**

We collect and process the personal data you have directly submitted to us

**When you offer to provide or provide goods or services to us (supplier or service provider)**

We collect and process the personal data that have been directly submitted with us by you or by your authorised representatives – employees

**When you enter our premises**

We collect and process the personal data that have been directly submitted with us by you and by the CCTV recording.

**With whom we share your Personal Data**

We may disclose and share the personal data we collect or you share with us with third party recipients if:

- we are legally required to do so
- we are authorised under our statutory obligations
- we are authorised under our contractual obligations
- you have given us your consent

When sharing your personal data with third parties, we comply with our legal and regulatory obligations in relation to your personal data and maintain appropriate safeguards in place, to include ensuring that all third party recipients have access to your personal data on a strictly “need to know basis” so that they can fulfil the obligations they have undertaken against and properly provide their services to us, that such third party providers process your personal data exclusively on our behalf and according to our instructions, that such persons will comply with the GDPR and the Cyprus personal data laws and regulations and, where applicable, maintain appropriate safeguards in place by entering into “data processing agreements ” pursuant to article 28 of the GDPR.

Your personal data may be shared with the following third party recipients:

- Individuals working with us e.g. our employees
- External service providers assisting in our day to day business e.g. courier providers
- External service providers assisting in implementation of our procedures e.g. IT systems or software or support service providers or website developers
- External collaborators e.g. banks, legal counsels, accountants, auditors, translators
- Our wholly owned subsidiaries



- Supervisory and other regulatory authorities who have power to request information from us e.g. Cyprus Bar Association
- Government Departments and Public Authorities e.g. the Tax Department, the Social Insurance Department, the Civil Registry & Migration Department, the Department of Registrar of Companies & Intellectual Property and Criminal Prosecution Authorities
- Fraud prevention agencies
- Credit institutions and other financial institutions
- Third parties engaged in the course of the services we provide to clients such as outside counsel, arbitrators, mediators, clerks, witnesses, cost draftsmen, court, opposing party and their lawyers, document review platforms and experts such as tax advisors and auditors
- External security company staff members

The above is a non-exhaustive list of persons and entities with whom we might share your personal data with. There may be other instances and persons to whom we may disclose your personal data as applicable.

## Transfer of your Personal Data outside the EEA

We do not transfer your personal data to countries outside the EEA (European Economic Area) EEA: EU Member States plus Iceland, Liechtenstein and Norway

Exceptionally, your personal data may be transferred to countries outside the EEA if:

- this is required for fulfilling our contractual obligations
- you have granted us your consent
- this is required by law

Processors in countries outside the EEA, which are not considered ensuring an adequate level of protection of personal data by the EU Commission or a national data protection authority (the so called “Unsafe Third Countries”) are obliged to comply with the data protection level in Europe and provide appropriate safeguards in relation to the transfer of your personal data in accordance with article 46 of the GDPR. Where we use agents/service providers located in such Unsafe Third Countries we will ensure that they (i) apply the level of protection required under the GDPR and (ii) act in accordance with our written instructions and our policies and standards. Any cross-border transfer of your personal data outside the EEA will be performed by us in line with the applicable provisions of the GDPR and the Cyprus personal data laws and regulations, such as by using the European Commission's standard contractual clauses.



## For how long we keep Personal Data (Retention Period)

In general we retain your personal data for the period necessary to fulfil the purposes for which it was initially collected. We may keep your data for longer than the period referenced below if this is required or permitted by law or is necessary for us to defend our legitimate interests such as to respond to or conduct prospective or actual legal claims or proceedings or achieving the purposes for which they have been collected. Where we no longer require your personal data we will ensure that it is either securely deleted or destroyed or stored in a way which means it will no longer be used by us.

### **When you are interested in becoming our client**

The personal data submitted for our Due Diligence and Know-Your-Client procedures will be retained for the duration of the evaluation process and in the case of unsuccessful evaluation i.e. in accordance with our necessary internal procedures we cannot accept you as a client or you do not wish to proceed in business relationship with us, we will keep your personal data up to three (3) months thereafter.

### **When you are our client and are engaged with us to be provided with administrative/nominee services and legal services which require AML procedures**

We will keep your personal data submitted for our Due Diligence and Know-Your-Client procedures, identification information, transaction documents, exchange of correspondence and any suspicious transaction references during the period of our business relationship, either as individual client or in respect of legal entities as beneficial owner, shareholder, director, authorized representative - agent - contact person, and, subject to applicable law providing for longer period, for five (5) years after the termination of our business relationship (or last interaction with you). We may keep your personal data for additional five (5) years in the event that the further retention of documents and information for prevention purposes is reasonably justified, detecting or investigating money laundering and financing of terrorism, without affecting the criminal provisions procedures relating to evidence in relation to ongoing criminal investigations and procedures. Your "Right to Erasure" (see below) cannot be exercised earlier than the period referred to above, as this would constitute a violation of the provisions of the law.

We may keep other personal data collected in the context of providing you with administrative/nominee services for seven (7) years after the termination of our engagement, contractual or business relationship (or last interaction with you). We may keep your personal data for longer than seven (7) years if this is required or permitted by law or is necessary for us to defend our legitimate interests such as to respond to or conduct prospective or actual legal claims or proceedings or to respond to enquiries related to tax, accounting, legal or administrative matters or achieving the purposes for which they have been collected.

**When you are our client and are engaged with us to be provided with legal services with no AML procedure****When you contact us via telephone or email to seek legal or administrative/nominee services****When you offer to provide or provide goods or services to us (supplier or service provider)**

We will keep your personal data during the period of our engagement and business relationship for seven (7) years after the termination of our engagement, contractual or business relationship (or last interaction with you). We may keep your personal data for longer than seven (7) years if this is required or permitted by law or is necessary for us to defend our legitimate interests such as to respond to or conduct prospective or actual legal claims or proceedings or to respond to enquiries related to tax, accounting, legal or administrative matters or achieving the purposes for which they have been collected.

**When you enter our premises**

Your personal data collected via the CCTV operation will be retained by us for fifteen (15) calendar days from the moment of capture. After that period any CCTV footage is automatically deleted.

## How we secure your Personal Data

Pamboridis LLC is committed to ensuring that your personal data is and remains secure and confidential. In order to prevent unauthorised access, use or disclosure of your personal data, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the personal data that we collect. Our security technologies and procedures are regularly reviewed to ensure that they are up to date and effective. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Privacy Policy, the GDPR and the Cyprus personal data laws and regulations.

The personal data you provide to us is stored on our secure local servers and are protected by access codes and firewall. We use Symantec Endpoint Protection to protect disks, files and folders. For the transmission of information via emails we use Microsoft 365. Unfortunately, the transmission of information via the internet is not completely secure and there cannot be assurance of absolute protection. While we take reasonable steps to protect all information submitted to us and received by us in accordance with the Privacy Policy, we cannot, in any event, guarantee the security of any personal data transmitted to us via e-mail and, in general, through the internet, and as such any transmission is at your own risk.

In case we keep your personal data in paper form your personal data is stored in designated secure spaces within our premises where no unauthorised access is permitted.

All of our partners, employees, consultants, workers and data processors, who have access to, and are associated with the processing of your personal data, are obliged to respect the confidentiality and security of such personal data and comply with the GDPR and the Cyprus personal data laws and regulations.

## What rights do you have regarding your Personal Data

You have the following rights exercisable any time free of charge:

- **Right of Access:** You have the right to request access and receive information from us regarding the processing of the personal data we hold about you (Article 15 of the GDPR)
- **Right to Rectification:** You have the right to request and obtain from us without undue delay the rectification of inaccurate or incorrect personal data we hold about you (Article 16 of the GDPR)
- **Right to Erasure:** You have the right, in the event that the requirements specified in article 17 of the GDPR have been met, to request the erasure of the personal data we hold about you. Accordingly, you may request the erasure of your data, for instance, if it is no longer necessary for the purposes for which it was collected. Furthermore, you can also request erasure if we process your data on the basis of your consent and you withdraw this consent (Article 17 of the GDPR)
- **Right to Restriction:** You have the right to request the restriction of the processing of the personal data we hold about you if the requirements specified under article 18 of the GDPR have been met. This is the case, for example, if you dispute the accuracy of your personal data. You may then request that processing is restricted for as long as it takes to examine the accuracy of your personal data (Article 18 of the GDPR)
- **Right to Data Portability:** Provided that the data processing is based on your consent or on the fulfilment of a contract and that it is also carried out using automated processing, you have the right to request and receive the personal data we hold about you in a structured, common and machine-readable format and to forward it to another data controller (Article 20 of the GDPR)
- **Right to Object:** If processing is based on our legitimate interest, you have the right to object to the processing of the personal data we hold about you if you believe your fundamental rights and freedoms outweigh our legitimate interests (Article 21 of the GDPR)

- **Right to Withdraw Consent:** If we rely on your consent (or explicit consent) as our legal basis for processing the personal data we hold about you, you have the right to withdraw that consent at any time. However, the withdrawal of your consent (or explicit consent) shall not affect the lawfulness of processing based on such consent before its withdrawal (Article 7 of the GDPR)
- **Right to Raise Concern:** You may exercise your above rights or contact Pamboridis LLC to raise any concerns or request information on the processing of the personal data we hold about you by contacting our Data Protection Officer (DPO) at the details provided below (Article 38(4) GDPR)
- **Right to lodge a complaint:** If at any case, you are of the opinion that we infringe your privacy, you have the right to lodge a complaint with the Office of the Commissioner for Personal Data Protection of Cyprus:  
Address: Iasonos 1, 1082 - Nicosia – Cyprus  
PO Box 23378, 1682 - Nicosia – Cyprus  
Tel: +357 22 81 845 60  
Fax: +357 22304565  
Email: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)

You may find more information at [www.dataprotection.gov.cy](http://www.dataprotection.gov.cy)

## Contact Us

Your point of contact for issues related to your personal data in general and for exercising your rights is our Data Protection Officer (DPO). You may contact our DPO either by email or by post:

**Address:** Pamboridis House, 45 Digeni Akrita Avenue, CY-1070, Nicosia, Cyprus

**Email:** [info@pamboridis.com](mailto:info@pamboridis.com)

We will endeavour to respond to any request as soon as possible and no longer than 30 calendar days from the receipt of the request. In case where we will not be able to respond to your request within the aforementioned time period or in case your request is rejected, we will inform you accordingly explaining the reasons for any delay or for rejecting your request.

## Change of this Privacy Policy

We reserve our right to amend this Privacy Policy from time to time and any changes will become effective when we upload the revised Privacy Policy to this Website. We will reasonably endeavour to notify you when we make changes to this Privacy Policy and we will amend the revision date at the bottom of this page. We do however encourage you to review this Privacy Policy periodically so as to always be informed about how we process and protect your personal data.

20  
years

Pamboridis LLC

ADVOCATES & LEGAL ADVISORS  
ΔΙΚΗΓΟΡΟΙ & ΝΟΜΙΚΟΙ ΣΥΜΒΟΥΛΟΙ

*October 2023*