



PRIVACY POLICY

GENERAL:

This Privacy Policy sets out how A. Yiorkas & Co LLC (*hereinafter referred to as “Yiorkas Law” or as the “Firm”*) processes data, whether on individuals (including personal data in respect of individuals who are clients, intermediaries or other third parties that the Firm interacts with, or any individual who is connected to those parties) or otherwise. Where the data held are on individuals, this document also sets out the rights of those individuals in respect of that personal data.

This Privacy Policy has been prepared in accordance with the provisions of the EU General Data Protection Regulation (*hereinafter referred to as the “GDPR”*). Any questions relating to this Privacy Policy or requests in respect of personal data should be directed to our Data Protection Officer (*hereinafter referred to as the “DPO”*) at info@yiorkas.law.

WHO WE ARE:

A. YIORKAS & CO LLC, is a company duly incorporated under the laws of the Republic of Cyprus with Registration No. HE 444092, operating as a law firm in Cyprus.

Yiorkas law aims to protect personal data and apply high standards of conduct when it comes to privacy issues, and ensures as well that its employees are provided with the appropriate training in order to handle personal data promptly and in accordance with the laws. Furthermore, the Firm endeavors to ensure that any parties with whom it co-operates apply the same high standards when it comes to data protection and privacy as the Firm.

WHAT DATA DO WE HOLD:

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

- Contact Details (including names, postal addresses, email addresses and telephone numbers);
- Information required by the 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;



- 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);
- Financial Information, such as payment related information;
- Meetings attended and visits to our offices;
- Any other information you may provide to the Firm.

WHY DO WE NEED THEM:

The Firm ensures that the data collected and processed is relevant to one or more processing activities and that the Firm does not collect or process more or less data than what is reasonably required for achieving the purpose of each processing activity. Furthermore, for each purpose of processing, there is always at least one lawful basis to secure that the rights of individuals are safeguarded by all means. The Purposes of processing and the lawful basis of each processing activity are the following:

- **Client Relationship and Services Provision of the Firm;**
- **Identity Verification and Record Keeping lists** - Processing is necessary for compliance with a legal obligation to which the Firm is subject.
- **Meeting all Legal, Regulatory and Ethical obligations applicable to the Firm** - Processing is necessary for compliance with a legal obligation to which the Firm is subject or for the exercise of functions of public authorities.
- **Follow up on Feedback, Inquiries and Complaints;**
- **To Promote and Improve the Firm's Services;**
- **Marketing Purposes;**
- **Any other Purpose(s) which has been agreed by or notified to you.**

Note: In cases where an individual has been provided with this Privacy Policy and provides personal data thereafter, the processing may be carried out on the basis of consent. Consent may be withdrawn at any time by writing to info@yiorkas.law. It is in the legitimate interests of the Firm as a provider of legal services to collect and process certain personal data to execute the aforementioned purposes.



SOURCES AND RECIPIENTS OF DATA:

The sources of data may include clients, intermediaries, data subjects directly, third parties connected to the data subject (for example, their employer or another service provider who provides services to the data subject) or open-source material.

Reasonable endeavours are made to ensure that data is only accessible by those with a need for access to fulfil the purposes set out above. Requests for access to be restricted in any particular manner should be made to info@yiorkas.law and will be considered and, where possible with reference to legal and regulatory obligations, actioned.

RIGHTS OF DATA SUBJECTS:

Data subjects in the European Union have certain rights in respect of their personal data. Any such data subject wishing to exercise any rights under applicable data protection laws, including:

- Right to withdraw any consent to processing previously given;
- Right of access to data;
- To have data corrected, updated, rectified or erased;
- For access to data to be restricted or provided to any third party;
- To object to any particular processing;
- To lodge a complaint with the relevant supervisory authority;
- Right of data portability,

should send the request in the first instance to info@yiorkas.law.

In response to such requests, the Firm reserves the right to require the individual making the request to provide certain details about himself/herself so that the Firm can validate that the individual is indeed the person whom the data refers to. The Firm is required to respond to the request of the individual within 40 (Forty) days and it will endeavor to do so wherever possible. The Firm reserves the right to charge a reasonable fee to cover any expenses that may arise from the request. In any case in which a data subject chooses not to provide any personal data, or where any of the rights set out above are exercised to limit the processing of personal data, the Firm may be unable to provide relevant services, or there may be restrictions on the services which can be provided. Retention of data The Firm retains personal data in accordance with the Data Retention Policy. Any personal data provided to the Firm is retained according to the Firm's ISO procedure IMS-01, Clause 4.0 Control of Records, to fulfil the purposes for which the data was collected. After the fulfilment of the purposes for which the personal data



was collected, such data will be destroyed, unless destruction is prohibited for legal, regulatory or technical reasons.

USE OF PERSONAL DATA IN LEGAL PROCEEDINGS:

In case it becomes necessary that the 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 Firm, you expressly agree that the personal data provided by you can be relied upon in identifying and taking legal action against you.

CHANGES TO THIS PRIVACY POLICY:

The Firm keeps this Privacy Policy 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 Firm's website at www.yiorkas.law, without any prior notice to you.

COMPLAINTS PROCEDURE:

The Firm has a Data Protection Officer and all enquiries in respect of this Privacy Policy or any requests to exercise any of the rights set out above should be directed to the Data Protection Officer via info@yiorkas.law.

CONTACT INFORMATION:

If you have any queries regarding any of our terms, please contact us.