

PRIVACY POLICY

Data protection information under the EU General Data Protection Regulation 2016/679 (GDPR)

This privacy statement ("Statement") has been drafted by and applies to Elixos Ltd, a company registered in Cyprus with registered number HE 391518 and all their subsidiaries (collectively, "Elixos," "we," or "us").

In this Statement, we explain our practices regarding the collection, use, processing and disclosure of your Personal Information, what kind of Personal Information we collect from you and when we collect them.

Collection of Personal Information

"Personal Information" is information that identifies you as an individual or relates to an identifiable individual i.e. through which you may be identified. It always has to do with physical persons and does not concern legal entities such as companies. The Personal Information which we collect is the following:

- a) Name, home, gender and work address, landline and mobile telephone numbers and email address, your business title, date and place of birth, nationality, passport, visa or other government-issued identification information;
- b) Debit and credit card numbers, other card information and generally payment, billing and account information;
- c) Employer or other relevant details if you are an employee of a corporate account, a vendor or other type of business partner;
- d) personal characteristics, nationality, income, passport number and date and place of issue;
- e) your reviews and opinions about our services;
- f) Profile picture;
- g) Social media account ID or user ID;
- h) Any other type of information which you may choose to provide to us or we may obtain about you through third parties with whom we do business (e.g. travel agents or similar providers); I) Your images on CCTV;
- j) CV's; and
- k) any other publicly available Personal Information, including information that is published on websites and any which you have shared via a publicly available platform such as your Facebook, Twitter or Linked In pages.

If you submit any Personal Information relating to other people to us, especially Personal Information of minors, in connection with the services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Statement.



We and our service providers and/or agents and/or affiliates may collect Personal Information, directly from you and/or indirectly through another source whether these are provided in writing or verbally and in providing any part of our services, ways such as the following:

- a) Through Our Media service: We may collect Personal Information you communicate with us via online chat-texting services or a social media service which may include messenger (linkedin).
- b) Through Our Offline Services: We may collect Personal Information from you offline. This may take place when you visit our offices and/or when you have a meeting with any person of our staff, and when you communicate with any member of our staff over the phone or via e-mail.
- c) From Other Sources: We may receive your Personal Information from other sources, such as publicly available databases and websites, your employers, our associates, introducers and other third parties who, however, have first obtained your permission to share this information with us.

In the event that we receive information from third parties, as opposed to directly from you, provided that they are lawfully entitled to share your Personal Information with us, we will use and share this information for the purposes described in this Statement. Also in the event that your Personal Information is collected in this way, then we will bring to your attention the information included in this Statement along with the source from which the Personal Information originate, and if applicable, whether it came from publicly accessible sources. This information shall be provided to you within a reasonable period after obtaining the Personal Information, but at the latest within 1 month, except where the Personal Information are to be used for communication with you, in which case we will provide you with the above information at the latest at the time of the first communication with you. However, if the above information is envisaged to be disclosed to another recipient then the above information shall be disclosed the latest when the Personal Information are first disclosed to the new recipient, despite the fact that none of the previous deadlines has passed. Of course, no such information would need to be provided:

- a) where you already have this information;
- b) where the provision of this information, for some reason, proves impossible or would involve disproportionate effort to obtain;
- c) obtaining or disclosure is expressly laid down by Union or Member State to which we are subject, and which provide measures to protect your legitimate interest;, or
- d) in the event where the Personal Information must remain confidential subject to an obligation of professional secrecy.

Use of Personal Information

We may use Personal Information in the following ways

- a) for the provision of the services you request from us including:
 - administration services,
 - fiduciary services,
 - corporate services,



- management services,
 - trustee services,
 - opening of bank accounts in Cyprus or foreign countries, □ legal services,
 - consulting services,
 - financial services,
 - accounting services, and
 - any other services included to any service agreement and/or engagement letter signed by the Client with the Service Provider (hereinafter referred to as the “Service Agreement”),
- b) to corresponding with you;
- c) to respond to you requests;
- d) To send you tax and deadline alerts, tax news and/or other informative material about the state of the law and the economy, important business and legal events and developments on both Cyprus and international levels;
- e) To send you administrative information;
- f) For our business purposes, such as data analysis, audits, security and fraud monitoring and prevention (including through the use of closed circuit television, card keys, and other security systems);
- g) To verify your identity when you access your account or to contact you to perform security checks;
- h) to generate statistics in relation to the types and volumes of clients to whom we provide services during the year; and
- i) to gather information about potential employees and member of staff candidates.

In the event that we decide to further process your Personal Information for a purpose other than that for which your Personal Information was obtained, we shall provide you prior to that further processing with information on that other purpose and with any relevant further information which the General Data Protection Regulation requires.

Disclosure, Sharing and Transfer of Personal Information

Your Personal Information may be shared with the below entities and/or people, which may involve cross-border transfer of information to third parties in countries outside the European Economic Area:

- a) to authorised personnel at our offices, who are appropriately-trained for the processing of Personal Information;
- b) affiliate and subsidiary companies of Elixos;
- c) agents in any jurisdiction for the registration and management of your company/ies,
- d) your auditors with who you have an Engagement Letter,



- e) your legal consultants and/o advocates and/or solicitors and/or barristers and/or lawyers with whom you have an Engagement letter and/or agreement
- f) to the bank in which you wish to open a bank account
- g) to the Cyprus Registrar of Companies, the Commissioner of Taxation in Cyprus, the Service Provider's service providers and any other regulators or supervisory authorities,
- h) any other associates and/or agents and/or to whom you instruct the us to transfer your Personal Information,
- i) In the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings), we may share your Personal Information to a third party for the purposes of the aforementioned event.
- j) If you visit any of our properties for the purpose of a meeting and/or an event, then the Personal Information collected for the meeting and/or event may be shared with (1) the organisers of that event and/or meeting, and (2) where appropriate, the guests who participate in the event and/or meeting.
- k) Other circumstances in which the sharing of your Personal Information may take place are in order to:
 - 1) comply with applicable laws,
 - 2) respond to governmental inquiries or requests from public authorities,
 - 3) comply with valid legal process,
 - 4) protect the rights, privacy, safety or property of Elixos, visitors, clients, employees, those of any of our affiliates or the public,
 - 5) permit us to pursue available remedies or limit the damages that we may sustain,
 - 6) respond to an emergency; and
 - 7) to allow us to pursue available remedies or limit the damages that we may sustain.
- L) where your Personal Information is transferred by Elixos to a country outside the European Economic Area (EEA) Elixos shall ensure that the country to which the Personal Information is transmitted are in the Adequate Countries List.

Where there is no confirmation from the European Commission that a particular country, which is outside the EEA, keeps satisfactory level of protection, authorization will be sought from the competent data protection authority in Cyprus i.e. the Office of the Commissioner for the Protection of Personal Information in Cyprus or transferred using Standard Contractual Clauses.



Elixos will not, in any way and in any event, directly or indirectly, sell any of your Personal Information to any third party. Any information supplied will be confidential and will be handled in accordance with the applicable laws and regulations.

Confidentiality and Personal Information

Elixos employs suitable personnel and take appropriate organizational and technical measures for the processing of Personal Information, their security and protection from accidental or unlawful destruction, accidental loss, alteration, unauthorized dissemination or access or any other form of unlawful processing.

Elixos carries out checks and/or uses contractual terms to ensure that any party to whom my Personal Information are transferred complies with the principles of confidentiality and the Law and where that the Service Provider determines the way in which the Personal Information will be processed and the purpose for which they will be processed, the Service Provider carries out checks and/or contractual terms to ensure that Personal Information is processed in accordance to their instructions.

Any information related to me shall not be disclosed to third parties except in the cases allowed under the provisions of the Law, and to any person to which I have assigned my rights in relation to the Contract and solely for matters concerning them.

Legal grounds for collection and processing of Personal Information

We would like to inform you that the legal grounds for receiving and handling your Personal Information are:

- a) that processing is necessary for the provision of the services you seek from Elixos, which include but are not limited to the services mentioned under "Use of Personal Information" above (Regulation, Art. 6(b));
- b) to the extent that the collection and processing is not covered by a) then the legal ground will be your explicit consent to the processing of your Personal Information for the above specific purposes (Regulation, Art. 6 (a)). You may withdraw your consent at any time by sending us written notice of your wish to withdraw. This may be done in any written format including e-mail and fax and also includes the automate way to opt out from newsletters and publications (unsubscribe mechanism);
- c) that processing is necessary for compliance with our legal obligations (Regulation, Art. 6(c));
- d) that processing is necessary in order to protect your vital interests or those of another individual (Regulation, Art. 6 (d)).
- e) that processing is necessary for the legitimate interests pursued by us except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of Personal Information, in particular where the subject is a child (Regulation, Art. 6(d)).



Your rights

Under the Regulation, you have the following rights:

- a. to check whether and what kind of Personal Information we hold about you and to access or to request copies of such data;
- b. to be explained clearly and simply the information contained in this Statement;
- c. to request correction, supplementation or deletion of Personal Information about you that is inaccurate or processed in noncompliance with applicable legal requirements;
- d. to instruct the erasure of your Personal Information from our archives where:
 - it is no longer necessary for the purposes mentioned in this Statement;
 - where you withdraw your consent on which the processing is based and where there is no other legal ground for the processing;
 - where you object at any time to the processing of your Personal Information in accordance to point (f) and (g) below;
 - your Personal Information has been unlawfully processed;
 - your Personal Information has to be erased in order for us to comply with our legal and/or regulatory obligations.
- e. to obtain a restriction to the collection, processing or use of Personal Information about you where:
 1. the accuracy of your Personal Information is contested by you to allow us to verify the accuracy of your Personal Information;
 2. the processing is unlawful but you do not wish us to erase your Personal Information from our archives;
 3. we no longer need your Personal Information for the purposes of processing, but they are required by you for the establishment, exercise or defence of legal claims; or
 4. you object to the processing of your information which is based on your consent, subject to limited exceptions such as the establishment, exercise or defence of legal claims;
- f. to object to processing of your Personal Information on grounds, relating to your personal situation, which have been obtained based on the necessity for the legitimate interests pursued by us, and to have us no longer process your personal data unless either we demonstrate to you compelling legitimate grounds for the processing which override your interest, right and freedoms, or the Personal Information is needed for the establishment, exercise or defence of legal claims;
- g. to object at any time to processing of your data for direct marketing;
- h. to the extent that your data is processed on the legal ground of your consent or the processing is carried out by automated means, to receive the data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from our part;



- i. to know the identities of third parties to which your personal data is transferred;
- j. to provide instructions on how your data must be handled after your death when relevant;
- k. to lodge a complaint with the competent data protection authority, in Cyprus i.e. the Office of the Commissioner for the

Protection of Personal Data;

Office of the Commissioner for Personal Data Protection:

Office address: Iasonos 1, 1082 Nicosia, Cyprus

Postal address: P.O.Box 23378, 1682 Nicosia, Cyprus

Tel: +357 22818456

Fax: +357 22304565

Email: commissionerdataprotection.gov.cy

l. to withdraw your consent at any time. If, following the provision of the consent, you then no longer wish to receive from us on a going-forward basis tax and deadline alerts, tax news and/or other informative material about the state of the law and the economy, important business and legal events and developments on both Cyprus and international levels, you may opt-out emailing us to info@elixos.co

m. to request us to transmit your Personal Information to another controller without hindrance from our part.

How you can exercise your right?

If you would like to review, correct, update, suppress or delete Personal Information that you have previously provided to us, you may contact us at info@elixos.co or:

Christodoulou Chatzipavlou 199

4th floor, office 4A, 3036

Limassol-Cyprus

Tel. 00357 25589058

To exercise your rights we encourage you to submit written requests to avoid disputes over details.

For your protection we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Security

Reasonable organizational, technical and administrative measures are in place to protect your Personal Information from unauthorized access, disclosure, alteration or destruction, while the Personal Information is stored in our archives. Among the things used to ensure the protection of your data are the minimization of people who have access to the electronic and physical archives where the Personal Information are stored.



ELIXOS

T: 25 589058

A: Christodoulou Chatzipavlou 199,
Floor 4, Office 4A, 3036 Limassol, CY

E: info@elixos.co

We also carry out check to ensure that our affiliates and service providers with whom we share personal information, have reasonable measures in place to provide an adequate level of data protection and to maintain the confidentiality of your Personal Information.

We will not contact you by mobile/text messaging or email to ask for your confidential personal information or payment card details. If you receive this type of request, you should not respond to it. We will only ask for payment card details by telephone when you are booking a reservation or promotional package. We also ask that you please notify us at info@elixos.co

If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “Contacting Us” section below.

Special category of Personal Information

“Special Category of Personal information” amount to such information the processing of which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

We do not generally collect Special Category information and we ask that, unless there is a regulatory or other serious need for you and/or another client and/or a third party, you do not to send us, and you do not disclose, any Special Category Personal Information to us.

Minors

We do not knowingly collect personal information from individuals who are under 18 years of age. As a parent or legal guardian, please do not allow your children to submit personal information without your permission. By providing us with the personal information of your children, you represent that authority has been given by both parents for the provision of this information.

Retention Period:

Unless we hear otherwise from you or a longer retention period is required or permitted by the applicable law or there is a continuous contractual and/or service relationship between you and Elixos, your Personal Information will be subject to our 3-year retention policy. This retention period is in our opinion necessary to fulfil the purposes outlined in this Statement.

However, CV's which are received by Elixos for the purposes of employment, will only be retained for one year.

Your Personal Information shall be destroyed as early as practicable, from both our short-term system and our back-ups so that restoration and/or reconstruction of the data is no longer possible. This also involves the secure destruction of any printed paper through methods such as cross-shredding.

Updates to this Privacy Statement

Where the need arises for the further protection of your Personal Information and for the purposes of your information, we may change and/or modify this Privacy Statement from time to time. Where we

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make material changes to this Statement you will be informed through a communication channel that you have provided (i.e. email).

Any changes become effective from the date on which they were incorporated into our AML Manual.

Contact Us

In the event that you have any questions about this Privacy Statement or you want to exercise any of your rights regarding your Personal Information please contact us at info@elixos.co:

Elixos Ltd

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