



Privacy Policy

www.faicomply.com

FAI respects your privacy and is committed to being open and transparent with our processing of your personal data. We have implemented practices that are designed to protect your privacy, employing appropriate security measures and controls to minimise and mitigate any unauthorised access, disclosure, destruction or alteration of your personal data.

If you submit identifying information to our website, you agree to our use of such information as described in this Privacy Policy.

What information do we retain?

FAI will gather information and documentation to personally identify, contact or locate you, and may gather information from third parties and other sources which will help us to offer our services effectively.

Personal information we may hold includes the following:

- Name, address and contact details
- Occupation
- Date of birth
- Bank account details for deposits held, filing fees and payment of accounts
- Details of the services provided to you by FAI

FAI will not collect any unnecessary personal data from you and will process your information in accordance with legal and regulatory requirements.

Why do we retain your personal information?

We rely on the following legal grounds to process your information:

- **Compliance with law or regulation** – we may collect and use your personal information in order to comply with law and regulation.
- **Contract performance** – we may collect and use your personal information in order to enter into a contract with you or perform a contract with you.
- **Legitimate business interests** – we may collect and use your personal information in order to further our legitimate business interests such as improving our services, websites and for record keeping purposes
- **Consent** – we will only use your personal information per legal and regulatory requirements, please see 'What are your rights' below.

When you enquire about or receive legal services we record information about you, mainly to assess your requirements for legal services. If you become a client of FAI, then we use the information to provide legal services.

We also use and may disclose your information to—

- consider other enquiries you ask us about
- help us develop and identify products and services that may interest you
- tell you about our products and services (unless you have asked us not to) or recommend legal products and services
- maintain our relationship with you
- conduct market or client satisfaction research
- perform our internal administration and operations including accounting, reporting, risk management, record keeping, archiving, systems development and testing and staff training, and
- comply with legislative or regulatory requirements.

Collecting your information is essential in determining your requirements and for us to provide our services. Without your information we would not be able to provide you with information about our products and services.

Do we disclose your personal information to anyone?

From time to time, we may need to disclose some of your information to the following types of organisations (including individuals):

- Your agents, including other legal advisers.
- Your executor, administrator, trustee, guardian or attorney.
- Regulatory bodies, government agencies, law enforcement agencies and courts.
- Other parties we are required by law to disclose information to.

We take all reasonable steps to ensure the personal information we retain is current, accurate, complete and securely maintained.

We use security procedures to protect any personal information we hold. Access to and the use of personal information is appropriately limited to prevent misuse or unlawful disclosure of the information.

If you have any concerns about the completeness or accuracy of the information retained about you, FAI will take the necessary steps to correct it.

Where do we store your information?

The information that we collect from you is stored within the European Economic Area (“EEA”) but may also be transferred to and processed in a country outside of the EEA. Any such transfer of your personal data will be carried out in compliance with applicable laws.

Information collected by our ISP

Like most Internet Service Providers (ISPs), in order to give you access to our website, our ISP needs to collect some information about you. This information is made available to us.

When you read or download information from our website, our ISP collects the following information about you?

- your Internet address;
- your domain name, if applicable; and
- the date and time of your visit to our website

Our ISP also collects information such as the pages our users’ access, the documents they download, links from other websites they follow to reach our website, and the type of browser they use. However, this information is anonymous and is only used for statistical and website development purposes.

Use of Cookies

In order to improve our website, we are keen to understand better what sections of our website you find to be most useful and interesting.

“Cookies” allows our website to store tokens of information in your browser. They give your browser an identifier which is used by our website while you are on it. Cookies help us to identify what areas of our website are popular based on traffic to those areas.

The use of cookies is now standard operating procedure for most websites. This website uses cookies to collect anonymous information about users for statistical purposes only. Cookies are not used to determine or track the identity of any user. This website will not store personal information such as email addresses or other details in a cookie. We use session (not permanent) cookies.

Most Internet browsers are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to notify you each time a cookie is sent to your computer, giving you the choice whether to accept it or not.

Through our ISP and by using cookies, we can identify your web browser but not you.

How long do we keep this information?

We will only hold your information for as long as necessary. How long we hold your personal information for will vary and is dependent on:

- The purpose for which we have your personal information – we need to keep your personal information for as long as necessary to fulfil the purpose and with regard to any contractual obligations
- Legal or regulatory obligations – we need to keep certain personal information for minimum periods set out in law or regulation.

If you ask us to remove you from our marketing list, we may keep your personal details on an “opted-out” list in order to ensure that we do not market to you again.

Your personal data will be held for a maximum of 5 years.

What are your rights?

You have certain rights in respect of the information we hold relating to you:

- **Right to access:** You have the right to request information about the personal data we hold on you, the purposes the data is being processed and obtain a copy of it at any time. Upon request, information must be provided to you without delay and at the latest within one month of receipt. We are able to extend this by a further two months if the request is complex and numerous but will inform you accordingly.
- **Right to portability:** You have the right to obtain and reuse your personal data for your own purposes across different services. Whenever FAI process your personal data by automated means based on your consent or based on an agreement you have the right to get a copy of your data transferred to you or to a nominated party. This only includes the personal data you have submitted to us.
- **Right to rectification:** You have the right to request rectification of your personal data if it is incorrect or incomplete.
- **Right to be forgotten:** You have the right to require us to delete your personal information if our continued use of it is not justified in specific circumstances including: where it is no longer necessary in relation to the purpose for which it was collected/processed, when you withdraw consent, when you object to its processing and there is no overriding legitimate interest for continuing the

processing, in order to comply with a legal obligation or if the data was unlawfully processed. There are some specific circumstances where the right to erasure does not apply.

- **Right to restrict processing:** In some circumstances, where you may not be entitled to require us to erase your personal information, you may be entitled to limit the purposes for which we can use your information.
- **Right to withdraw your consent to processing:** You have the right to withdraw the consent you have given us to allow us to process your personal information or to receive any materials from us
- **Right to object to direct marketing:** You have the right to object to direct marketing, including profiling analysis made for direct marketing purposes.

How can you exercise your rights?

In order to exercise these rights, to request a Subject Access Request or if you have any concerns about our use of your personal information, please contact our privacy officer at info@fai.com.cy

You can also contact the Office of the Commissioner for Personal Data Protection in which is the supervisory authority in the Republic of Cyprus for the implementation and enforcement of data protection law.

Website: <http://www.dataprotection.gov.cy>

Address: 1 Iasonos str., 1082 Nicosia, P.O.Box 23378, 1682 Nicosia.

Tel: +357 22818456

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Email: commissioner@dataprotection.gov.cy