

GDPR COMPLIANCE POLICY

As of 25 May 2018, the EU General Data Protection Regulation 2016/679 (known as GDPR) will be enforced for the protection of natural persons against the processing of personal data and the free circulation of them. The GDPR shall replace the Directive 95/46/EU which was applied by law 138(I)/2001 and was designed to harmonize data privacy laws across Europe, to protect and empower all EU citizens data privacy and to reshape the way organizations across the region approach data privacy.

GFSC MANAGEMENT LTD (“us”, “we” and “our”) is the data controller of your personal data and is subject to the EU General Data Protection Regulation 2016/679.

We, GFSC MANAGEMENT LTD (hereinafter called “GFSC GLOBAL”), as service providers are obliged to secure our clients and any other third parties such as employees, contractors, principals and any other party related to us, personal data which in any way came to our possession.

More information may be obtained from the European Commission’s relevant website [here](#) and from the official Cyprus Government portal at www.dataprotection.gov.cy.

Based on the GDP Regulation, any physical person has the following rights:

- To have access to the personal data and information which we possess and ask for a copy;
- To ask from us to correct the personal data we hold about you, if this is incorrect;
- To require us to delete your personal data from our records;
- To require us to restrict our personal processing activities related to your personal data;
- To require us not to send marketing communications to you;
- To receive from us the personal data we hold about you, in a reasonable format specified by you, including the purpose of transmitting of your personal data from us to another data controller.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. Should any law require the keeping and maintenance of certain date for a longer period of time we undertake to arbitrarily or on your request remove from our data system upon the lapse of the period provided by the GDPR, data relating to you which may be irrelevant or unnecessary for keeping for the purposes of compliance with any such law/s or regulation/s.

The contact details for our Privacy and Data Protection Officer (DPO) are:

Name: Christoforos Christoforou through the company Sizerro Management Ltd

Email: christof@sizerro.com

Tel: +357 22322743, Fax: +357 22328231

Any complaints you may have with regards to any violation of your rights under the GDPR may be lodged with the relevant supervisory authority whose details are as follows:

Officer of the Commissioner on Personal Data Protection

1, Iasonos Str., 1082 Nicosia

P.O.Box 23378, 1682 Nicosia

Tel: +357 22818456, Fax: +357 22304565

Email: commissioner@dataprotection.gov.cy

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

GFSC GLOBAL is collecting your data in numerous ways including, but not limited to, the below:

- From information provided by you when we meet you in person;
- From information given to us by you via telephone, email, fax or other forms of electronic communication. In this respect, we may monitor, record and store any such communication and/or information shared with us;
- When you or your authorized representative is completing and signing our application or other forms to request our services;
- From publicly available sources or from third parties when we need to conduct background checks about you;
- When you sign agreements, which are entered between your self and any one of the GFSC GLOBAL group of companies.

What categories of Personal Data we collect:

- Name and any contact information we consider necessary (email, address, telephone etc);
- Any necessary biographical information which will confirm your identity (passport, ID, nationality, place and date of birth etc);
- Information related to your financial situation such as income, expenditure, assets, source of funds, value of wealth, bank account details and anything else we find it proper to be requested;
- Information related to your knowledge and experience in the relevant field;
- Understanding of your goals and objectives in procuring our services;
- Information about your personal circumstances, marital status, family, education, employment and any other relevant information.

How we use your personal data, other than your concern:

We process your personal data because it is necessary for the performance of an agreement to which you are a party or in order to take steps at your request prior to entering into this agreement. We use them also for our legitimate interests or where it's necessary for the legitimate interest of another person. Finally, we use them for our compliance with a legal obligation which we are under

In this respect, we use your personal data for the following:

- To prepare a proposal for you regarding our services;
- To provide you with the services as set out in our agreement with you or the application forms you have completed and signed as otherwise agreed with you from time to time;
- For any other purpose for which you provide us with your personal data and we consider proper that they need to be used;
- For marketing to you;
- For the administration and management of our business;
- To meet our compliance and regulatory obligations (compliance with anti-money laundering laws, etc);
- As required by tax authorities, courts or any other legal authority.

In this respect, we may share your personal data with or transfer it to the following:

- Your agents, advisers, intermediaries, and custodians of your assets who you tell us about;
- Third parties whom we engage to assist in delivering the services to you, including other companies of GFSC GLOBAL, associates of GFSC GLOBAL, agents, accountants, lawyers, auditors etc;
- Third parties who assist us in conducting background checks;
- Our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, IT or public relations advisers in order to assist you;
- Other third parties such as intermediaries who we introduce to you. We will wherever possible tell you who they are before we introduce you;
- Our data storage providers.

Marketing material

We will send you marketing material related to services we provide, as well as other information in the form of alerts, newsletters and invitations to events or functions which we believe might be of interest to you.

We will communicate this to you in a number of ways including by post, telephone, email, SMS or other digital channels.

If you object to receiving marketing from us at any time, please contact us:

Via email: info@gfscglobal.com or telephone: +357 25269400

If you should wish to have your name and address removed from our specific purposes mailing list, you should provide us with clear Instructions in this respect. However, in such a case we shall not be held liable and you hereby relieve us of any liability with respect to any information of essence which may not reach you.