

PRIVACY POLICY

Your Legal Partners (“YLP”, “we”/”us”/”our”), acting as a data controller, collects data to operate effectively and provide you (any data subject in relation with YLP) with high quality services. We commit to safeguard your privacy and for this purpose we have developed procedures and measures, in compliance with the General Data Protection Regulation - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“GDPR”), the applicable Greek law 4624/2019 and the decisions and guidelines of the Hellenic Data Protection Authority.

Definitions used in this Privacy Notice has the meaning ascribed to them in the GDPR.

1. Data we collect and process

To provide our services, we collect and process certain information about you. The data we collect depends on the scope of your interactions with YLP, the type of the services provided, the legal obligations of YLP etc. The data we collect and process can include the following, but is not limited to:

- **Identification information:** full name, identity card or passport number, Tax Identification Number and Tax Office, date and place of birth, etc.;
- **Contact information:** telephone number (including mobile phone number) as well as email and postal address,
- **Business identification and contact information:** position/job title, role, department, company or organisation, telephone number, as well as email and postal address, and other data identifying you in relation to matters on which you instruct us or in which you are involved etc.;
- **Financial Information:** such as financial account information, if required to make or take payments or fulfil contractual obligations or for related purposes or other financial information required for the provision of services, work or otherwise;
- **Information from public sources and social media:** e.g. Linked in and similar professional networks, directories or internet publications; posts, Likes, tweets and other interactions with our social media presence;
- **Information in connection with investigations or proceedings:** where this is necessary to conduct the investigation or proceedings;
- **Special categories of personal data:** such as criminal record data, health/vaccination certificates and date of issuance;
- **Other:** any other personal data provided to YLP for the latter to perform its legal and contractual obligations, including its legal obligations to conduct under anti-money laundering, sanctions screening and regulatory checks.

We may collect your personal data from you, your employer, third-parties or public sources. Data may also be developed by us in the course of consummation of our contractual relationship.

2. Purposes for collection, use and processing of data

We collect, use or process your personal data for the following purposes (or as otherwise described at the point of collection) in line with the lawful basis under the GDPR:

- To provide our services that you have requested and in general to fulfill contractual obligations and exercise contractual rights;

- To deal with communications that you send to YLP and respond to your queries, requests and complaints;
- To comply with our legal or regulatory obligations, namely in respect to anti-money laundering, counter terrorist financing etc. or to assist in law enforcement and investigations by competent authorities;
- For our legitimate business interests or those of a third party, namely managing our business and relationship with you or your company or organization; understanding and responding to client feedback; developing relationships with business partners; ensuring debts are paid; provided this does not override any interests or rights that you have as an individual; for the presentation, evaluation, assessment and ranking of YLP and our business etc.;
- Where you have provided us with your prior consent, for example where you share details for particular purposes;

We collect, use or process your special category data only where:

- we have your explicit consent for the particular processing;
- this is necessary to protect your vital interests or those of another person: for example, in medical emergencies;
- you have manifestly made the data public: for example, where you have published it on social media;
- this is necessary to deal with legal claims: for example, involving court proceedings;
- this is necessary for substantial public interest: for example to prevent or detect unlawful acts.

3. Sharing personal data

We may share your personal data as necessary to render any service you have requested or authorised, to comply with our legal obligations and rights and to defend our rights before the competent courts or authorities; or in case you have provided your consent, namely with the following:

- **Service providers:** we may disclose/transfer your data to third parties that we refer as service providers (such as IT support service providers, accountants, other counsels, marketing services providers etc.) solely to the extent necessary to enable such service providers to provide services to YLP and to assist us in providing services to you and in our business development. Our suppliers have to meet minimum standards as to information security, abide by our data privacy and security requirements and they will only be provided data in line with their function;
- **Third parties:** we may disclose/transfer your data to third parties such as administration and public authorities, banking institutions, notaries, domiciliation agents and to professional advisors and auditors.
- **Safety, security and compliance with law:** we will access, transfer, disclose and preserve personal data to comply with applicable law or respond to subpoenas, court orders or other valid legal process, for reasons relating to national security, or public health, to defend against legal claims, to protect the rights and safety of YLP, YLP's clients, employees or others. This may involve the sharing of your data with law enforcement, government agencies, courts and other organisations.
- **Consent:** we may share your data in other ways and for new purposes if you have asked us to do so and have consented to such sharing.

If those recipients are located outside the European Union, your personal data will not be transferred to any country outside the European Union, unless such country ensures an adequate level of protection or specific measures have been taken, such as the conclusion of adequate

contractual agreements in compliance with the model clauses issued by the European Commission.

4. Security of personal data

We understand the importance of protecting your privacy and we will ensure your data is safeguarded and held securely in accordance with our obligations under the GDPR. Reasonable and appropriate technical and organizational measures have been implemented to ensure personal information is protected and to prevent your personal data from being lost, used, accessed in an unauthorized way, altered or disclosed. We also limit access to your personal information to those employees, contractors and other third parties on a need-to-know basis. This access will be granted on a confidential basis and processing of the information will only take place subject to our instruction.

5. Retention of personal data

YLP will only retain your personal data for as long as it is reasonable required in view of their use, or until you withdraw your consent if and where applicable. We may retain your data for an additional period if required in order to defend legal claims arising during any relevant retention period. Typical retention periods will range from 5 to 15 years.

6. Your rights

You have certain rights in relation to your information, as listed below:

- **Access:** You are entitled to request access to the information we hold about you (known as a ‘data subject access request’). You are entitled to receive a copy of the personal information we hold about you and to check that it is being lawfully processed.
- **Correction:** If the information we hold for you is incomplete or incorrect, you have the right to request a correction.
- **Erasure:** You are entitled to ask us to delete or remove personal data in certain circumstances. There are also certain exceptions where we may refuse a request for erasure, for example, where the personal data is required for compliance with law or in connection with claims.
- **Restriction:** You are entitled to ask us to suspend the processing of certain of your personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Portability:** You may us to help you request the transfer certain of your personal data to another party.
- **Objection:** Where we are processing your personal data based on a legitimate interests (or those of a third party) and you may challenge this. However, we may be entitled to continue processing your information. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Consent withdrawal:** Where we are processing personal data with consent, you can withdraw your consent.

Some of these rights will only apply in certain circumstances. If you would like to exercise, or discuss, any of these rights, please contact us, in writing, at the email address mentioned below.

You can also lodge a complaint with a data protection supervisory authority. In Greece you can make a complaint to the Hellenic Data Protection Authority (1-3 Kifissias Av., Athens, Greece, PC 11523, tel. +30 210 64 75 600, www.dpa.gr).

7. Your required cooperation

We expect you to inform us in writing and without undue delay of any changes in the information you have provided to us or others about you, so that we can keep it up-to-date.

If you provide us with personal information not relating to you (e.g. information about your respective representatives, staff members and agents, beneficial owners, shareholders, etc. or about any third party), you must first adequately inform them about this fact and make sure they acknowledge and/or accept (as the case may be) that we can use such information as set out in this Privacy Policy.

8. Updates and amendments of this Privacy Policy

This Privacy Policy was last updated in November 2021.

We reserve the right to amend this Privacy Policy from time to time to reflect changes in the law, our data collection and used practices, and to ensure it remains accurate, complete and up-to-date. Any changes we make to this policy in the future will be posted to our website at: <http://www.yourlegalpartners.gr/>. You are advised to check this Privacy Notice from time to time.

9. How to contact us

If you have any questions or concerns about our use of your personal data or regarding this Privacy Policy, you may contact us in writing (318 Mesogeion Avenue, Agia Paraskevi, 15341, Greece) or by email (maria.golfinopoulou@yourlegalpartners.gr).