



PRIVACY NOTICE

The present Privacy Notice is prepared in the light of the **General Data Protection Regulation (EU Regulation 2016/679)**, hereinafter “GDPR” and “the Regulation” respectively, which is applicable as of the 25th of May 2018.

“**Personal Data**” means any information relating to an identifiable person (natural person) who can be directly or indirectly identified.

“**Processing**” means various types of operations regarding the Personal Data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Responsibility for Processing of Personal Data

“**Controller**” of your personal data is Christabel Corporate Services Limited, an Administration Service Provider registered under the laws of the Republic of Cyprus, with registration number HE205472, with registered office address at 118 Agias Fylaxeos, Christabel House, 3087 Limassol, Cyprus. References to the Controller in this Privacy Policy include:

- Christabel Support Services Limited, with principle place of management at 118 Agias Fylaxeos, Christabel House, 3087 Limassol, Cyprus, arranging the accounting and bookkeeping on behalf of customers.
- Hightsight Rentals Ltd, with principle place of management at 10 Pikionis, 3075 Limassol, Cyprus, providing services of office rentals.

The Controller collects and/or processes the Personal Data of existing, future and former clients. The term clients may include individuals to whom a service is provided directly and/or individuals who act as signatories on behalf of the individual, contact persons, attorneys and/or officers, directors, shareholders and ultimate beneficial owners in case of Corporate clients.

The Controller collects and processes the Personal Data of an Individual on a lawful basis in order to comply with other Law and Directives related to the services provided, (Article 6(1)(c) of the Regulation).

The type of Personal Data the Controller may collect is:

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|------------------|---|
| Demographic Data | Name, Gender, Date of Birth, Age, Nationality, Citizenship |
| Contact Details | Home/Work Postal Address, Home/Work landline phone number, Home/Work mobile phone number, Personal/Work email address |



| | |
|--------------------------------|--|
| Financial Data | Source of Funds and Source of Wealth, information on financial transactions (where applicable), Tax Residency information, Tax Declaration |
| Personal and Professional Data | Information on education, employment and family of the individual and information on any potential political involvement of the individual |
| Correspondence Data | Records of any Correspondence with the individual |

How the Personal Data is collected:

- directly from you;
- your authorised representatives;
- business introducers;
- publicly available sources;
- government and law enforcement agencies;
- generated by ourselves.

How this information is used

The Controller evaluates your Personal Data both manually and automatically to evaluate certain personal aspects, hereinafter referred to as “**profiling**”.

The Controller is legally obliged to take anti-money laundering, anti-fraud and anti-terrorist financing measures. Data evaluations are also carried out in this context. Each element of the information collected from the individual is being scored in order to evaluate the risk each individual bears.

With whom your Personal Data are shared

The Controller keeps your Personal Data safe and provides access to the officers of the Controller who require such access to perform their tasks and to facilitate your requests.

The Controller, may share your information with third parties in order to provide services to you. Those third parties may include:

- banks, financial institutions and any other similar organizations that are nominated by the Client;
- auditors;
- accountants;
- agents;
- lawyers/advisors;
- to Companies providing services such as packaging, mailing and delivery purchases, postal mail etc;



- any organization at the Client's request or any person acting on behalf of the client;
- any third parties where this is necessary to process a transaction or provide services which the client has requested.

The Controller may be required by law or regulation or court order to disclose your Personal Data to Governmental, legal, regulatory or similar authorities, central and/or local government agencies, any tax authorities and the police.

International Transfer of Personal Data

Your Personal Data may be transferred outside of the European Economic Area ("EEA") when this is required for: the execution of your orders or where it is prescribed by the law and/or under your consent.

Whenever the Controller sends your Personal Data outside the EEA, the Controller will make sure that your Personal Data is protected in the same way as if it was being used in the EEA. The Controller will use one of the following safeguards:

- Adequacy Decision of the European Commission;
- Suitable Standard Contractual Clauses to ensure equivalent protection to the EEA; or
- Other valid transfer mechanisms.

Data Security of your Personal Data

The Controller commits to ensure protection of your Personal Data by applying appropriate technical and organisational security measures to ensure protection of your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or unauthorised access.

You are responsible for ensuring that any Personal Data send to the Controller are send securely.

In instances where the Controller discloses your Personal Data to third parties, within EEA, requires such third parties to have appropriate technical and organization measures to ensure the protection of your Personal Data.

Data Storage

The Controller will keep your information for as long as you have a relationship with us. After the end of the business relationship, the Personal Data will be kept for the period of at least five years in order to meet any legal, accounting or reporting obligations.



YOUR Legal Data Protection Rights

The Regulation provides you with several rights regarding your Personal Data. A summary of those rights is given here below. For more complete information please refer to the Regulation Articles 15 to 21.

- **Right of Access;** access your Data from the Controller and confirm whether or not they are being processed, *(see Article 15 of the Regulation)*.
- **Right to Rectification;** correct inaccurate Personal Data we hold about you, *(see Article 16 of the Regulation)*.
- **Right to be Forgotten;** entitles you to submit a request to the Controller to delete or remove your personal data, in certain cases, as there is no longer necessity and/or you have withdrawn your consent and/or you have objected to the processing etc *(see Article 17 of the Regulation)*. The Controller may have legal or other official reasons that needs to keep your Personal Data.
- **Right to Object;** you have the right to object to the processing of your Personal Data in certain cases, *(see Article 21 of the Regulation)*.
- **Right to Restrict;** enables to you suspend the processing of your Personal Data in certain cases, *(see Article 18 of the Regulation)*.
- **Right to data Portability;** request the transfer of your Personal Data to you or to a third party, *(see Article 20 of the Regulation)*.
- **Right to file a complaint;** if you are unhappy with the use of your Personal Data by the Controller, you have the right to file a complaint with the supervisory authority.

Withdraw of Consent

Where the Controller relies on your consent for the processing of your Personal Data, you may withdraw your consent at any time by sending us an email at privacy@christabelonline.com. The Controller shall inform you before giving effect to your withdrawal notification.

Changes to this Privacy Notice

The Controller may amend this privacy notice from time to time. A copy of the latest version of this notice will be available from our Website and will be provided to you upon request. In case of significant changes, the Controller will bring this changes to your attention.

For any matters related to the Data Protection please contact the Data Protection Officer at privacy@christabelonline.com.