

Privacy Notice

General

This Privacy Notice sets out how Transcapital Business Consulting Ltd (the “Company”) processes data, whether on individuals (including personal data in respect of individuals who are clients, intermediaries or other third parties that the Company interacts with, or any individual who is connected to those parties) or otherwise. Where the data held are on individuals, this document also sets out the rights of those individuals in respect of that personal data.

This Privacy Notice has been prepared in accordance with the provisions of the EU General Data Protection Regulation (“GDPR”).

The Company is committed to protect personal data and apply high standards of conduct when it comes to privacy issues. It ensures that its employees are provided with the appropriate training in order to handle personal data promptly and in accordance with the laws. Furthermore, the Company endeavors to ensure that any parties with whom it co-operates apply the same high standards when it comes to data protection and privacy as the Company.

Any questions relating to this Privacy Notice or requests in respect of personal data should be directed to our Data Protection Officer (DPO) at dpo@transcapital-consulting.com.

Who we are

The Company is a leading corporate services provider operating out of its offices in Nicosia, Cyprus and Moscow, Russian Federation.

What data do we hold?

The Company processes data in the context of providing corporate and other services to its clients. The categories of data it may collect and process, according to the particulars of each case, include:

- contact details (including names, postal addresses, email addresses and telephone numbers);
- information required by the Company to meet legal and regulatory requirements, in particular in respect of anti-money laundering legislation, including information on source of funds and source of wealth;
- information provided in the course of the provision of corporate services (for example, information on professional relationships and background, financial wealth and assets held, transactions entered into, tax status);
- financial information, such as payment related information;
- meetings attended and visits to our offices;
- any other information you may provide to the Company.

Important notice on Special Category Data

In certain instances, the personal data that the Company processes may include “Special Category Data” (which includes information on a person’s race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data processed for the purpose of uniquely identifying a natural person, health data, data on a person’s sex life or sexual orientation or data relating to a person’s criminal record or alleged criminal activity). In such instances, legal bases for processing that data may include explicit consent (where the Special Category Data has been provided to the Company by the data subject for any of the above-listed purposes) or the processing is being necessary for compliance with a legal obligation.

Why do we need them?

The Company ensures that the data collected and processed is relevant to one or more processing activities and that the Company does not collect or process more or less data than what is reasonably required for achieving the purpose of each processing activity. Furthermore, for each purpose of processing, there is always at least one lawful basis to secure that the rights of individuals are safeguarded by all means.

The purposes of processing and the lawful basis of each processing activity are the following:

Purpose	Lawful basis of processing
To enter into client relationship and for providing the services of the Company	<p>In cases where an individual has been provided with this Privacy Notice and provides personal data thereafter, the processing may be carried out on the basis of consent. Consent may be withdrawn at any time by writing to dpo@transcapitalconsulting.com</p> <p>It is in the legitimate interests of the Company as a provider of corporate services to collect and process certain personal data in the context of providing those services</p> <p>The processing is necessary to perform and fulfill the contract with the individual for the provision of corporate services</p>
For identity verification and record and for maintaining lists for correspondence	Processing is necessary for compliance with a legal obligation to which the Company is subject
To ensure the security of the Company’s system, staff and premises (including the use of CCTV equipment in the public areas of the premises)	<p>It is in the legitimate interests of the Company to protect its business environment, staff and premises from being misused or victimized in any way and to ensure that business operations run smoothly without unauthorized interruption</p> <p>By entering the Company’s premises, any individual automatically consents to the use</p>

	of CCTV for monitoring purposes and to abide by the internal health and safety procedures of the Company
To meet all legal, regulatory and ethical obligations applicable to the Company	<p>Processing is necessary for compliance with a legal obligation to which the Company is subject or for the exercise of functions of public authorities</p> <p>It is in the legitimate interests of the Company as a provider of corporate services to process data to the extent necessary to ensure that it meets all legal, regulatory and ethical obligations applicable to the Company</p>
For the purposes of internal know-how and training	It is in the legitimate interests of the Company as a provider of corporate services to process data for internal know how and staff training.
To follow up on comments, enquiries and complaints	<p>In cases where an individual has been provided with this Privacy Notice and provides personal data thereafter, the processing may be carried out on the basis of consent. Consent may be withdrawn at any time by writing to dpo@transcapitalconsulting.com</p> <p>It is in the legitimate interests of the Company as a provider of corporate services to collect and process certain personal data to enable it follow up on comments, enquiries and complains in order to enhance client/user experience with the services of the Company</p> <p>To perform and fulfill the contract with the individual for the provision of corporate services</p>
To promote, improve and further the provision of the Company's services	<p>In cases where an individual has been provided with this Privacy Notice and provides personal data thereafter, the processing may be carried out on the basis of consent. Consent may be withdrawn at any time by writing to dpo@transcapitalconsulting.com</p> <p>It is in the legitimate interests of the Company as a provider of corporate services to collect and process certain personal data to enable it follow up on comments, enquiries and complains in order to enhance client/user experience with the services of the Company</p>

<p>For marketing purposes including sending updates on important legal developments and news about the Company’s work and invitations to educational seminars and events</p>	<p>In cases where an individual has been provided with this Privacy Notice and provides personal data thereafter, the processing may be carried out on the basis of consent. Consent may be withdrawn at any time by writing to dpo@transcapital-consulting.com or by unsubscribing by following the appropriate procedure which can be found in the relevant marketing material (e.g. by selecting the “unsubscribe” option in the email sent to you)</p> <p>It is in the legitimate interests of the Company as a provider of corporate services to process personal data to communicate with persons on topics and events which may be of interest to those individuals</p>
<p>Any other purpose(s) which has been agreed by or notified to you</p>	

The Company shall not carry out any automated decision-making activities, including profiling, using your personal information.

For further information on the use and storage of your data, please request the Company’s Data Protection Policy by writing to dpo@transcapital-consulting.com

Sources and Recipients of data

The sources of data may include clients, intermediaries, data subjects directly, third parties connected to the data subject (for example, their employer or another service provider who provides services to the data subject) or open-source material.

Reasonable endeavours are made to ensure that data is only accessible by those with a need for access to fulfil the purposes set out above. Requests for access to be restricted in any particular manner should be made to dpo@transcapital-consulting.com and will be considered and, where possible with reference to legal and regulatory obligations, actioned.

The following is a list of potential recipients of data (in each case including respective employees, directors and officers):

- employees of the Company who are acquainted with the GDPR and have signed the Company’s Confidentiality and Non-Disclosure Statement of the Company;
- other service providers (legal, governance or otherwise, including any bank or financial institution providing services in relation to any matter on which the Company is instructed) where disclosure to that provider of services is considered necessary to fulfil the purposes set out above;
- any sub-contractors, agents or service providers of the Company;

- third parties with whom the Company engages for the hosting of events or other marketing initiatives;
- regulators or other governmental or supervisory bodies with a legal right to the material or a legitimate interest in any material;
- any registrar of a public register where the data is to be included in a public registry.

Unless expressly declared in this Privacy Notice or with the prior consent of the individual, personal data collected from an individual will not be disclosed to any third party other than the above-named parties.

Where the Company is entering into an engagement with a third party pursuant to which data may be processed by that third party, the Company will seek to enter into an agreement with that third party setting out the respective obligations of each party and it will seek to be reasonably satisfied that the third party has measures in place equal to those of the Company to protect data against unauthorized or accidental use, access, disclosure, damage, loss or destruction.

In the event that any such third party is outside of the European Union and where the data being transferred would include personal data which would be protected under applicable Data Protection regulation the Company will ensure that it meets the relevant requirements of that Data Protection regulation prior to carrying out any such transfer. This may include only transferring the data where the Company is satisfied that:

- the non-European Union country has Data Protection laws similar to the laws in the European Union;
- the recipient has agreed through contract to protect the information in the same Data Protection standards as the European Union;
- we have obtained consent from relevant data subjects to the transfer;
- if transferred to the United States of America, the transfer will be to organizations that are part of the Privacy Shield.

Rights of Data subjects

Data subjects in the European Union (or any jurisdiction with equivalent legislation to the European Union General Data Protection Regulation) have certain rights in respect of their personal data. Any such data subject wishing to exercise any rights under applicable data protection laws (including the right to withdraw any consent to processing previously given; the right of access to data; or to have data corrected, updated, rectified or erased; or for access to data to be restricted or provided to any third party; or to object to any particular processing; or to lodge a complaint with the relevant supervisory authority; or the right of data portability) should send the request in the first instance to dpo@transcapital-consulting.com.

In response to such requests, the Company reserves the right to require the individual making the request to provide certain details about himself/herself so that the Company can validate that the individual is indeed the person whom the data refers to. The Company is required to

respond to the request of the individual within 40 days and it will endeavour to do so wherever possible.

The Company reserves the right to charge a reasonable fee to cover any expenses that may arise from the request.

In any case in which a data subject chooses not to provide any personal data, or where any of the rights set out above are exercised to limit the processing of personal data, the Company may be unable to provide relevant services, or there may be restrictions on the services which can be provided.

Retention of data

The Company retains personal data in accordance with the Data Retention Policy. Any personal data provided to the Company is retained to fulfil the purposes for which the data was collected. After the fulfilment of the purposes for which the personal data was collected, such data will be destroyed, and a Destruction Certificate will be retained in the Company's records, unless destruction is prohibited for legal, regulatory or technical reasons.

Any requests for further information in relation to the continued processing of specific data and requests for destruction of data should be made to dpo@transcapital-consulting.com.

For further information on the retention and destruction processes of the Company, please request the Company's Data Retention Policy at dpo@transcapital-consulting.com.

Use of Personal Data in Legal Proceedings

If it becomes necessary that the Company has to take action against you for any reason whatsoever, including but not limited to recovering from you any money you owe to the Company, you expressly agree that the personal data provided by you can be relied upon in identifying and taking legal action against you.

Changes to this Privacy Notice

The Company keeps this Privacy Notice under review in order to ensure that it is in line with any changes to the laws relating to privacy and personal data. Any updates will appear on the Company's website at <http://transcapitalbc.com/>

This Privacy Notice was last updated on 18 May 2018.

Complaints procedure

The Company has a Data Protection Officer and all enquiries in respect of this Privacy Notice or any requests to exercise any of the rights set out above should be directed to the Data Protection Officer via dpo@transcapital-consulting.com or by post at:

Data Protection Officer, Transcapital Business Consulting Ltd, 2 Agapinoros Street & Makariou III, Iris Tower, office 401, 1076 Nicosia, Cyprus.

If you still feel that your personal data has not been handled appropriately according to the law, you can contact the Office of the Commissioner for Personal Data Protection, at:

1 Iasonos Str., 1082 Nicosia,

P.O. Box 23378, 1682 Nicosia

Tel: +357 22818456

Fax: +357 22304565

Email: commissioner@dataprotection.gov.cy