

Data Protection Notice

Data Protection Notice

Byron Capital Partners Ltd is a company incorporated in Cyprus with company registration number HE 236814 and registered address at 113 Prodromou Avenue, Second Floor, Office 201, 2064, Strovolos, Nicosia, Cyprus (the “**Company**”).

The Company respects your privacy and is committed to protecting your personal data. This Data Protection Notice will inform you as to how the Company treats your personal data and further inform you about your privacy rights and how the provisions of the General Data Protection Regulation (EU) 2016/679 (the “**GDPR**”) and the Cyprus Law (125(I)/2018) for the Protection of Natural Persons as to the Processing of their Personal Data and the Free Movement of such Data, protect you (the “**Privacy Notice**”).

i. What information is being collected

For the purposes mentioned in the following paragraph “Why it is being collected” we collect the following categories of personal data:

- a. Name, work contact details such as email, telephone number and address or such other contact details you have supplied us with in order to receive our communications.

ii. Why it is being collected

All the data you provide to us will be processed subject to the restrictions and for the purposes pointed out in this Notice, namely:

- a. to advise you through e-mail or phone call, in the framework of ordinary commercial relationship, about other products or services similar to those related to your professional interests.
- b. from time to time, we would like to contact you about events or conferences or seminars organised/sponsored by us or about our new services/products reaching you by email or phone call.
- c. as part of our client on-boarding procedures and to satisfy legal & regulatory requirements.

- d. to verify your identity;
- e. to deliver our services;
- f. For recruitment purposes.

The provision of data is discretionary however a lack of data can be an impediment to the exchange of information necessary for the above purposes.

iii. Our legal basis for collection, use or disclosure of your personal data

We will process your personal data for a number of lawful reasons:

- a. If you have given us consent;
- b. If this is necessary to comply with legal or regulatory/compliance obligations;
- c. If this is necessary to deal with legal claims;
- d. If this is necessary for the purposes of providing our services in accordance with the terms and conditions of the contract you have with us/performance of a contract;
- e. If processing is necessary for our legitimate business interests or those of a third party: provided this does not override any interests or rights that you have as an individual.

We have legitimate business interests in:

- a. establishing an employment agreement;
- b. providing our services;
- c. managing our business and relationship with you or your company or organisation;
- d. understanding and responding to inquiries and client feedback;
- e. understanding how our clients use our services and website;
- f. identifying what our clients want and developing our relationship with you, your company or organisation;
- g. improving our services;
- h. enforcing our terms of engagement and website and other terms and conditions;
- i. ensuring our systems and premises are secure;
- j. sharing data in connection with acquisitions and transfers of our business.

iv. Who is collecting data- Contact details

Data will be collected by the Company, acting as Data Controller. The Data Protection Department of the Company can be contacted by the following methods:

- a. Email: Investorrelations@bryoncapitalpartners.com
- b. Telephone: 00 357 22 364740
- c. Post: 113 Prodromou Avenue, Second Floor, Office 201, 2064, Strovolos, Nicosia, Cyprus

v. How is data processed?

Personal data is processed both manually and electronically in accordance with the above-mentioned legal basis and purposes and, in any case, in order to guarantee data security and data confidentiality in compliance with current regulations. Our Employees and Third-Party service providers (such as our I.T service providers) can access your data. Our Employees and third-party processors are appropriately designated and trained to process data only according to the instructions we provide them. We do not allow our Employees and third-party processors to use your personal data for their own purposes and only permit them to process your personal data for specific purposes and in accordance with the provisions of the GDPR. All the data will be processed until the withdrawal of consent or at the end of a defined retention period.

vi. How is data stored and with whom it could be shared?

We will hold your personal data securely in line with physical, technical and administrative security measures. Data is recorded on paper and IT systems. Basic personal data such as your name and contact details may be stored on our CRM system which is accessible to restricted list of staff for the above-mentioned purposes.

We may disclose your Personal Data with authorised service providers who perform services for us (including background checks and KYC, cloud services, data storage, payment processing, customer support and bill collection). Our contracts with our service providers include commitments that they agree to limit their use of Personal Data to our specific instructions and to comply with privacy and security standards.

Without prejudice to any communications made to comply with legal or contractual obligations, data may also be disclosed to external parties as required by laws or regulations (e.g. court, tribunal, Regulatory Authority or Governmental Entity).

When we share your information with other entities within our group or contracted Third Party companies, we take all reasonable steps to ensure that your information and privacy are protected in line with the applicable legal obligations and in accordance with the provisions of the applicable data protection legislation.

vii. Transfer of personal data outside of the European Economic Area (EEA)

We may transfer your personal data inside or outside the European Economic Area to service providers and/or any other affiliated entities. To the extent we transfer your personal data outside the EEA, we will ensure that the transfer is lawful and that a similar degree of protection is afforded to your personal data by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission or other data processing clauses which give personal data the same protection it has in Europe.

viii. How long do we keep your personal data?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for your personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

To this effect, your personal data will be stored for a period of 5 years from the date of the last successful contact or the end of the commercial relationship unless consent is withdrawn, or an erasure request is made.

ix. Your rights and how to exercise them

Subject to the provisions of the GDPR, you have certain rights in relation to your personal data which include the right to:

- a. **Request access** to your personal data (commonly known as a “**data subject access request**”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- b. **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- c. **Request erasure** of your personal data. Data subjects are allowed to request and obtain the deletion of their personal data as long as:
 - that data is not necessary anymore for the purposes for which it was initially collected and processed; the data subject wants to withdraw consent for the data processing;
 - they use their right to object to the data processing;
 - the personal data in question was unlawfully processed;
 - the personal data has to be erased for compliance with a legal obligation in EU or Member State law to which the controller is subject to; and
 - the personal data in question belongs to minors under 16 years of age.

Requests for data erasure can be rejected by data controllers and processors under special circumstances when:

- data is being processed while exercising the right of freedom of expression and information
- there is a legal obligation to process the data in question through the EU or Member State law to which the controller is subject to or it is a task that needs to be carried out in the public interest or in the exercise of official authority vested in the controllers
- there is a public interest in the area of public health
- in case of archiving in the public interest, for scientific, historical research or statistical purposes insofar as the deletion of the requested data might seriously impair the achievement of the objectives of that processing

- the data is needed to establish, exercise or defend legal claims
- d. **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal data which override your rights and freedoms.
- e. **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your personal data but we need to verify whether we have overriding legitimate grounds to use it.
- f. **Request the transfer of your personal data to you or to a third party.** You also have the right to receive your personal data that you provided to us in a structured, commonly used and machine-readable format and have the right to transmit such data to another controller without hindrance from us. In exercising your right to data portability, you have the right to have your personal data transmitted directly from a controller to another, where technically feasible.
- g. **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You can contact us to exercise your rights at the contact details mentioned in section no. (iv) above.

Right to complain

If you consider that the processing of your personal data infringes applicable data protection laws, as data subject you have the right, without prejudice to any other administrative or judicial remedy, to lodge a complaint with a supervisory authority, in particular, in the Member State of your habitual residence, place of work or place of the alleged infringement.

The Supervisory Authority for the Member State we are located in and where your data is processed is:

Office of the Commissioner for Personal Data Protection

www.dataprotection.gov.cy

1 Iasonos str., 1082 Nicosia

P.O.Box 23378, 1682 Nicosia

Tel: +357 22818456

Fax: +357 22304565

Email: commissionerdataprotection.gov.cy

x. Links to third party websites

The Company's website, newsletters, email updates and other communications may, from time to time, contain links to and from the websites of others. The personal data that you provide through these websites is not subject to this Notice and the treatment of your personal data by such websites is not our responsibility. If you follow a link to any other websites, please note that these websites have their own privacy notices which will set out how your information is collected and processed when visiting those sites.

xi. Changes to this notice

This Notice may be changed from time to time.

If we change anything important about this Notice we will highlight those changes at the top of the Notice and provide a prominent link to it for a reasonable length of time following the change. We encourage you to periodically review this Notice that can be found at the Company's website to be informed about how we are protecting your personal data.