

Introduction

Maintaining your privacy is really important to us. You entrust us with sensitive information, and we take that responsibility seriously. We will not disclose your personal details to any third parties unless it is necessary or where we are legally obliged to do so.

This Privacy Policy explains how we collect, store, and process personal data in the provision of services to our clients and users of our websites. Personal data includes any information relating to an identified or identifiable living person. 5Comply processes personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

Legal grounds we rely on

The law on data protection sets out a number of different reasons for collecting and processing your personal data, including:

Consent: In specific situations, we collect and process your data with your consent. For example, when you tick a box to receive email newsletters.

Contractual obligations: In certain circumstances, we need your personal data to comply with our contractual obligations. For example, if you instruct us to manage your licensing application then we will collect the necessary information to provide the service.

Legitimate interests: in specific situations, we require your data to pursue our legitimate business interests in a way which might reasonably be expected as part of running our business. Our legitimate business interests do not automatically override your interests - we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Controller and Processor

5Comply is the “Controller” and “Processor” of your personal information. 5Comply takes the appropriate measures (physical, organisational and technical) to ensure the safety of your personal data. Your personal information will be securely stored confidentially on our computer systems and/or in paper files. 5Comply as the Controller, collect personal data including but not limited to with the following ways:

- establishing a business relationship through a contract
- dealing or communicating with 5Comply
- business cards provided by an individual
- complete our online forms
- register for our seminars
- attend meetings or events we host
- visit our offices

Personal data that we may collect

The different types of personal data we may collect about you could include but not limited to:

- i. **Identity Data**: These may include, name, position, residential address, identification details (i.e. Passport/ID/Driving License) postal address, business address, mobile number, email address, proof of source of income, tax identification numbers;
- ii. **Contact Data**: includes email address, fax number telephone numbers;
- iii. **Financial Data**: includes bank account details and related information;
- iv. **Transaction Data**: includes details about payments to and from you and other details of products and services you have purchased from us;
- v. **Usage Data**: includes information about how you use our website, products and services;
- vi. **Recruitment Data**.

Use of your personal Data

5Comply may use your information in the following ways:

- Provide its services or enter into discussions for the provision of services to you;
- Carry out our obligations arising from any contracts entered into by you and us and manage the day-to-day tasks arising from our business relationship;
- To fulfil our legal and regulatory obligations;
- Seek your views or comments on the services we provide;
- For physical security and IT security purposes;
- Send you communications which you have requested and keep you informed in relation to its services and products that may be of interest;
- In compliance with its legal obligations including accounting and tax;
- Process a job application;
- For marketing purposes and based on 'Legitimate Interests'. You are free to opt out of at any time;
- For other legitimate business purposes.

Retention period for using your personal data

We retain personal data to provide our services, stay in contact with you and to comply with applicable laws, regulations and professional obligations that we are subject to. We retain personal data for as long as we have a legitimate business purpose to do so and where a specific legal, regulatory or contractual requirement applies. We will dispose of personal data in a secure manner when we no longer need it.

Provision of your personal data to third parties

We do not sell or distribute your personal data for commercial gain. We may process your personal data without your knowledge where this is required or permitted by law.

We may have to share your personal data with:

- Trusted third party service providers;
- Our auditors, insurers or regulatory bodies;
- Our mutual clients, whom you have given permission for us to share your data with;
- Third parties to whom we may sell or merge our businesses or assets.
- may also share your information where obliged to do so by an applicable court order and/or where required to do so by an applicable law.

All our third party service providers (EU or third country) are required to take appropriate security measures to protect your personal information in line with our policies. We work closely with them to ensure that your privacy is respected at all times. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

What are your data protection rights?

Your data protection rights are indicated here. To submit a data request please send us an email at info@fivecomply.com

- **Right to Access** – You can ask us to verify whether we are processing personal data about you, and if so, to provide more specific information.
- **Right of rectification** – You can ask us to correct our records if you believe they contain incorrect or incomplete information about you.
- **Right to Erasure** – You can ask us to erase (delete) your personal data after you withdraw your consent to processing or when we no longer need it for the purpose it was originally collected.
- **Right to Processing restrictions** – You can ask us to temporarily restrict our processing of your personal data if you contest the accuracy of your personal data, prefer to restrict its use rather than having us erase it, or need us to preserve it for you to establish, exercise, or defend a legal claim. A temporary restriction may apply while verifying whether we have overriding legitimate grounds to process it. You can ask us to inform you before we lift that temporary processing restriction.
- **Right of Portability** – In some circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another company if is technically feasible.
- **Automated Individual Decision-making** – You can ask us to review any decisions made about you which we made solely based on automated processing, including profiling, that produced legal effects concerning you or similarly significantly affected you.
- **Right to Object to Direct Marketing including Profiling** – You can object to our use of your personal data for direct marketing purposes, including profiling. We may need to keep some minimal information to comply with your request to cease marketing to you.

- **Right to Withdraw Consent** – You can withdraw your consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. It may mean we are not able to provide certain products or services to you and we will advise you if this is the case.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights. This helps us to ensure that personal data is not disclosed to any person who has no right to receive it. No fee is required to make a request unless your request is clearly repetitive, unfounded or excessive. Depending on the circumstances, we may be unable to comply with your request based on other lawful grounds.

Cookies

Like many websites, our websites use cookies. Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. The data we collected is aggregated in its nature and is not specific to any one visitor. This helps us to improve our website and deliver a better service. For information about our use of cookies, please view our Cookies Policy.

You can set your browser not to accept cookies. However, in a few cases some of our website features may not function as a result.

Data Security

We have put appropriate technical and organisational security policies and procedures in place to protect personal data (including sensitive personal data) from loss, misuse, alteration or destruction. We aim to ensure that access to your personal data is limited only to those who need to access it. Those individuals who have access to the data are required to maintain the confidentiality of such information.

If you have access to parts of our websites or use our services, you remain responsible for keeping your user ID and password confidential. Please be aware that the transmission of data via the Internet is not completely secure. Whilst we do our best to try to protect the security of your personal data, we cannot ensure or guarantee the security of your data transmitted to our site; any transmission is at your own risk.

Right to make a complaint

5Comply will endeavour to promptly respond to your requests and complaints. In the event that you are unsatisfied, with the way we have handled your personal data or any privacy query or request that you have raised with us, you may submit a complaint in writing at the following email address: info@fivecomply.com

We will try to respond to all requests within 1 (one) month. Occasionally, it may take us longer than 1 (one) month if your request is particularly complex or you have made a number of requests. In this case, we will notify you within 1 (one) month of the receipt of your request and keep you updated.

If you are not satisfied with our response to your complaint, you have the right to lodge a complaint with the Cyprus Data Protection Commissioner. You can find details about how to do this on the following website:

http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/page1i_gr/page1i_gr?opendocument

Changes to this Privacy Policy

This Privacy Policy is subject to change to reflect a change in the data protection practices or legal framework. In the case that this Policy will be amended the revised document will be posted on the 5Comply website and such change will apply from the date that it is posted unless otherwise stated in the revised Privacy Policy.