

## **Privacy Policy**

**Your privacy is important to us. This notice explains our online information practices and the choices you can make about the way your information is used at our Website ([www.chartac.com.cy](http://www.chartac.com.cy)).**

**Chartac Management Services Limited** (“Chartac”) is committed to protecting and respecting your privacy. We are aware of the concerns which exist over the security of information which you provide to us (both over the internet and otherwise). We may obtain, use, process and disclose personal data about you in order to carry out our instructions and for other related purposes including updating and enhancing our client records, analysis for management purposes and statutory returns, crime prevention and legal and regulatory compliance. We will only use contact details provided to us for marketing our services only if you have expressly consented to receiving such communication. If you have not consented to marketing, contact details will only be used for the purposes of providing our services to you.

### **The information we collect**

We do not collect personally identifiable information about you – such as your name, address, telephone number, fax number, e-mail address, etc. – unless you choose to fill out a ‘Contact Us’ form, found on many of the pages of the site or to email us directly.

We do automatically collect certain non-personally identifiable information when you visit our site – such as the type of browser you are using, the type of operating system you are using, and the domain name of your Internet service provider.

Personal information that we hold will include:

1. Personal data that you submit to us via the Chartac website and/or “Contact Us” application include: email address, forename(s), surname(s), former names, aliases, date of birth, device ID, primary residential address, occupation, nationality, country of birth, service address for documents, ID images and face images if applicable.
2. Personal information that we collect automatically via the website. When registering an account with us, we may collect data that identifies the type of mobile device you have, IP address, and other system activity.

We collect this information for the purposes of ID verification and conducting politically exposed person (PEP) and international sanctions checks against third party systems. We also use the information to check for potential identity theft and online fraud. Our service providers that process your personal data on our behalf for the purposes of these checks are bound by confidentiality and are not permitted to use your personal data for any other purposes. They also do not store any of your personal data long-term.

We will comply with all relevant laws including the Cyprus Personal Data (Protection of Individual) Law 2001 (as amended from time to time). For the purposes of the Cypriot Personal Data (Protection of Individual) Law 2001 the controller is Chartac. During the course of our instructions it is likely that it will be necessary to transmit elements of your data to jurisdictions which do not offer such protection as is afforded within the European Union, the transfer to which you hereby consent to.

We disclose personal data to law enforcement insofar as it is required by law or is strictly necessary for the prevention, detection or prosecution of criminal acts and fraud. We may

need to further disclose personal data to competent authorities to protect and defend our rights or properties, or the rights and properties of our business partners.

### **How we normally use information about you**

We use non-personally identifiable information to analyze site usage (such as aggregated information on the pages visited by our users), which allows us to improve the design and content of our site.

In the ordinary course, we use personally identifiable information you provide solely to respond to your inquiry or process an application form you have completed on various sections of our Web site.

Any data gathered will be shared, if appropriate, with any of the offices of Chartac throughout the world, including the United States, Europe and Asia and any third parties who provide services on our behalf. Personal Information which users in the European Union provide to us may be transferred to other countries (including the United States), the data protection laws of which may differ from those of the European Union, and you expressly agree to such transfer.

We will not contact you about other matters, unless you specifically request it, nor will we share, rent, or sell your personally identifiable information outside Chartac, except where we are required to share your information with any third parties who provide services on our behalf. If you are interested in applying for a job at Chartac and choose to submit resume information by email, we will use it only for the internal application review process. We will not voluntarily share, rent or sell it outside Chartac, except where we are required to share your information with any third parties who provide services on our behalf.

However, it is possible, though unlikely, that we might be forced to disclose personally identifiable information in response to legal process or when we believe in good faith that the law requires it, for example, in response to a court order, subpoena or a law enforcement agency's request.

Also, we cannot guarantee the privacy of personal information you transmit over the web or that may be collectable in transit by others, including contractors who provide services to us.

### **Collection of information by third-party sites and sponsors**

Our site contains links to other sites whose information practices may be different than ours. Visitors should consult the other sites' privacy notices as we have no control over information that is submitted to, or collected by, these third parties.

Chartac posts information about programs and events that are sponsored by or co-sponsored other firms or organizations. Should you choose to register electronically for any of these events, Chartac will have no control over the third-party sponsors' use of this information. As for our own use of your registration information, that will be handled by us as if you had registered by telephone or on paper. In other words, the privacy policies applicable to our Web site will not apply.

## **Cookies**

Our website uses cookies. A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your computer's hard disk so that the website can remember who you are. A cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie, and a value, usually a randomly generated unique number. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site and services.

We may use cookies in the following ways:

- Where they are essential to make our site work
- To enable the personalisation features on our site (which give you the ability to recall recently viewed pages and see information which you have input on line)
- To compile anonymous, aggregated statistics that allow us to understand how users use our site and to help us improve the structure of our site. We cannot identify you personally in this way.

For detailed information about cookies and how they are used on our website, see our **Cookie Policy**.

### **Disabling/enabling cookies**

You have the ability to accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of our site if cookies are disabled. For further information about disabling or blocking cookies, please see 'Can I withdraw my consent?' in our Cookie Policy.

### **Our commitment to security**

We employ security measures to prevent unauthorized access to information that we collect online. However, we cannot guarantee the security of your personal information.

### **How to contact us**

If you have any questions or concerns about the privacy policy for Chartac or its implementation, you may contact us at [info@chartac.com.cy](mailto:info@chartac.com.cy). If at any time you decide that we should no longer hold any of your personal data, or wish to change the use to which any such data can be put, please let us know by emailing us at [info@chartac.com.cy](mailto:info@chartac.com.cy).

You have the right to review the personal information that we keep about you. You can send a request to receive an overview of your personal data by emailing us at [info@chartac.com.cy](mailto:info@chartac.com.cy). To expedite handling please use the subject line "Requesting personal information". If your data is inaccurate or if you believe we are no longer entitled to use your personal data or have questions on how your data is used, please contact us at [info@chartac.com.cy](mailto:info@chartac.com.cy). You have the right to request that your personal information be removed from our systems by contacting us at [info@chartac.com.cy](mailto:info@chartac.com.cy) using the subject line "Requesting account deletion". We will be in touch with you to discuss any data retention for compliance with legal regulations and set a date for removal of your data. The processing of your personal data is controlled by Chartac.

In using our websites and/or applications, you consent to the collection and use of this information by Chartac in the ways described above. If you decide that you do not consent to our privacy policy, please discontinue using our services.

## **Revisions to our Privacy Policy**

We reserve the right to revise this policy or any part of it from time to time. Please review the policy periodically for changes.

### ***Data and IT security***

Chartac follows industry best practices for security in all areas. This includes formal onboarding and exit procedures for staff, robust logical access controls, strong password policies and tight physical and environmental security. Only authorised personnel are permitted to access personal data in the course of their work. Data leak prevention is augmented by careful asset management and encryption of all remote access sessions and corporate mobile devices. The network perimeter is secured by a multi-tiered firewall structure; internal systems are comprehensively covered by anti-virus software; and an intrusion detection system and other vulnerability monitoring tools are also in place.

Only best-of-breed hardware and software systems are installed, including for email security, document management, network security and mobile device management. Data is backed up frequently and backups rotated in accordance with a strict schedule. All backups are encrypted, and off-site copies are transported and stored by specialist service providers.