

## KINANIS ACADEMY PRIVACY POLICY AND STATEMENT

This privacy statement and policy is given in accordance with the provisions of the General Data Protection Regulation (EU) 2016/679 (the “**GDPR**”) on the protection of natural persons with regards to the processing of personal data and the free movement of such data, Law 125(I) of 2018 “Providing for the protection of natural persons with regard to the processing of Personal Data and for the free movement of such data” (as amended from time to time) as well as any applicable laws in Cyprus and/or abroad.

GDPR applies to all European Economic Area (EEA) countries, which comprises of all European Union (EU) member states plus Iceland, Liechtenstein and Norway and it concerns the processing of personal data in these countries, or the processing of personal data of any natural persons who are in the EU, which such processing takes place outside the EEA.

“Kinanis Academy” or “we” or “us” or “our”, is a department of Kinanis LLC, Law Firm, dedicated to professional training. In accordance with the abovementioned laws, we are considered as a Controller and we are obliged to inform you of the purposes for any personal data we request to collect from you and our intended means for their processing.

### 1. What do we mean by Personal Data?

“**Personal Data**” means any information relating to you, by which you can be identified, directly or indirectly. You may refer to the definition of Personal Data in both the Cyprus Law 125(I)/2018 and the GDPR.

### 2. What Personal Data of you do we process and for what purposes?

By subscribing to our mailing list, we collect and store your email address for the purpose of contacting you in relation to the upcoming seminars, webinars and events (hereinafter the “**Events**”) organized by Kinanis Academy.

We also collect and process certain other personal information provided by yourselves when you choose to register and participate in one of our Events or when you contact us via email, phone or otherwise, such as your name, surname, telephone number, gender, date of birth, age, address, ID number, IBAN number.

In addition, we also collect and process information in relation to your academic background, qualifications and certifications, in the event that you choose to cooperate with us and become a presenter in any one of our Events as a qualified practitioner certified by the Human Resource Development Authority of Cyprus. Please refer to Appendix 1.

We rely on a number of legal bases as per the GDPR for the collection and processing of your data, such as:

- (a) When the processing is based on your consent for the use of your personal data for example for the purposes of receiving information and updates on our upcoming Events;
- (b) When the processing is necessary to perform our legal obligations towards the Human Resource Development Authority of Cyprus;
- (c) When the processing is necessary to perform our contractual obligations towards you in relation to the services that we offer to you;
- (d) When the processing is necessary for our legitimate interests, provided that such interests do not override your privacy in any way. Such legitimate interests refer to managing the business affairs of Kinanis Academy so as to enable us to provide our services to you and the promotion of our Events.

### **3. How do we ensure Confidentiality of your Personal Data?**

Your Personal Data, may only be processed by the relevant, authorized personnel of Kinanis LLC responsible for the Kinanis Academy Department. Upon collection of your Personal Data, we may file them in hard-copy files, as well as electronically within our internal systems located in Cyprus. Note that there are appropriate organizational and technical security measures in place in order to ensure that access to your Personal Data is only restricted to the relevant authorized viewers/users. With regards to information and data that you share with us through the internet, please note that we cannot guarantee or warrant its security, as the transmission of data through the internet is never absolutely secure.

Your Personal Data will not be disclosed to third-parties, unless we are legally obliged to do so, or if we need to comply with our contractual duties to you. For example, we will need to pass certain information to the Human Resource Development Authority of Cyprus in order to comply with our legal obligations towards the said authority, in our capacity as a certified training provider.

### **4. What are your Rights?**

Since the Cyprus Law 125 (I) of 2018, of which the purpose is to effectively implement certain provisions of the GDPR, governs our relationship, you, as an individual, have a number of rights when it comes to the processing and privacy of your Personal Data.

- (a) Right of access:** you have the right of access and modification of your Personal Data;
- (b) Right of rectifications and erasure:** you have the right to request the rectification of your Personal Data in case these are inaccurate as well as the right to request the erasure of such Personal Data (the right to be forgotten);
- (c) Right to object to or restrict the processing of personal data;**

- (d) **Right to data portability:** you have the right to receive the personal data collected from us in a structured, commonly used and machine-readable format as well as the right to request the transmission of those data to another controller;
- (e) **The right to object to automated decision-making, including profiling:** you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you;
- (f) **The right to lodge a complaint with a supervisory authority:** you have the right to submit a complaint with the supervisory authority in the particular Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your personal data infringes the provisions of the GDPR and/or applicable legislation;
- (g) **The right to withdraw your consent:** where the processing is based on your consent, for example providing us with your email address for the purpose of enabling us to communicate with you and inform you of our upcoming events, you shall have the right to withdraw your consent at any time by sending an email to [academy@kinanis.com](mailto:academy@kinanis.com) . If you withdraw your consent for your personal data to be used for the above-mentioned purposes (i.e. email address), we will process your request for such withdraw of consent and will thereafter cease to use and/or disclose your personal data and proceed with the erasure of your personal data within 30 (thirty) calendar days, unless this personal data information is necessary for complying with other legal obligations under European and national law.

Your rights may be discussed with and/or exercised by contacting our appointed data protection officer, Mrs. Andrea Ioakim, who is the person responsible to address any issues related to personal data at [andrea.ioakim@kinanis.com](mailto:andrea.ioakim@kinanis.com) , telephone number: 00357 22 55 88 24.

#### **5. Unsubscribe Policy:**

You have the right to unsubscribe from our mailing list and opt out from receiving notifications in relation to our upcoming events. You can unsubscribe at any time by sending an email to [academy@kinanis.com](mailto:academy@kinanis.com) .

#### **6. How long do we retain your Personal Data for?**

Your Personal Data shall be maintained within our records for as long as we are required to meet our legal or contractual obligations requirements and/or justify our legitimate interests.

Any Personal Data not serving a purpose for processing supported by a justified legal basis, or upon the withdrawal of your consent (in the cases where the processing is based on your consent), will be erased immediately.

**APPENDIX 1:**

Personal Data Collection
Name
Surname
Telephone Number
Email Address
Identity Card Number
Age
Date of Birth
Profession
Academic & Professional Qualifications
Gender
IBAN number