



HOLBORN GROUP

PRIVACY POLICY

Application of this Policy:

Holborn Group of Companies take the security and privacy of our contracts seriously.

This policy is formulated by Holborn Group of Companies and shall apply to all employees, directors and officers of Holborn Group, as well as to consultants, contractors, temporary employees and agents performing services for the Holborn Group or on Holborn Group's behalf (such as our business partners). Any third parties acting for or on behalf of Holborn Group should be made aware of their obligation to comply with this policy. This policy applies in every country where Holborn Group does business. Where local customs, standards, laws, or other local policies apply that are stricter than the provision of this policy, the stricter rules must be complied with. However, if this policy stipulates stricter rules than local customs, standards, laws or other local policies, the stricter provisions of this policy shall apply.

Purpose of this policy statement:

This policy statement aims to give you information on how we collect and processes your personal data through your use of this website, including any data you may provide through this website when you purchase a product or service as per the Client Agreement.

This website is not intended for children, we do not knowingly collect data relating to children.

It is important that you read this policy statement together with any other policy statement or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

This policy statement is in line with the overall policies of Holborn Group's Policy and applies to all legal and physical persons. Please note that the purpose of this policy is to supplement the other notices and is not intended to override them.

Holborn Group of Companies

Holborn is a group of companies which have separate financial services authorisation in the jurisdictions in which they operate. Clients engage with the specific Holborn group company that operates in their jurisdiction, and it is solely via the regulator in that jurisdiction that they have recourse where applicable.
Holborn Assets Wealth Management (CY) Ltd is licensed by the Cyprus Securities and Exchange Commission (CySEC) (License No.: 394/20) the EEA/EU / Holborn Insurance Agents, Sub Agents & Consultants (Cyprus) Ltd license by the Insurance Companies Control Service (ICCS) (License No: 5228) Archway Private Wealth and Insurance Intermediation Ltd is a trading name of Holborn Insurance Agents, Sub Agents & Consultants (Cyprus) Ltd
Holborn Assets Ltd is licensed by the Financial Conduct Authority (Ref: 648817) in the UK
Holborn Limited is licensed by the Hong Kong Insurance Authority (license No. FB1221) in Hong Kong
Holborn Management Services SA (PTY) Ltd is licensed by the Financial Sector Conduct Authority (Ref: 44154) in South Africa
Holborn Assets Insurance Broker LLC is licensed by the Federal Insurance Authority (Ref: 180) in the UAE
Holborn (Labuan) Ltd is licensed by the Labuan Financial Services Authority (Ref: BS200756) in Malaysia
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Glossary

“Comply with a legal or regulatory obligation”: means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

“GDPR”: shall mean the EU General Data Protection Regulation 2016/679;

“Holborn Group”: shall mean any entity and or intermediary and or agent under the group of Holborn.

“Legitimate Interest”: shall mean the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by Contacting us

“Performance of Contract”: means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

“Personal data breach”: means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

“Profiling”: means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

“Third Parties”: shall mean external third parties and specific third parties.

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External Third Parties we shall mean:

- Service providers and or agents [acting as processors] such as IT and system administration services.
- Professional advisers [acting as processors or joint controllers] including lawyers, bankers, auditors and insurers based in the European Union and/or out of the European Union where applicable in general who provide consultancy, banking, legal, insurance and accounting services.
- Regulators and other authorities [acting as processors or controllers] based is in the European Union and/or out of the European Union where applicable who require reporting of processing activities in certain circumstances.

As Specific Third Parties we define the following:

- Supervisory and other regulatory and public authorities, in as much as a statutory obligation exists. This may include disclosures to appropriate regulatory authorities or Banks tax authorities, European Securities and Markets Authority and the European and International Banking Authorities, criminal prosecution authorities all of them located within EU and out of the EU where applicable [Controllers of personal data];
- Investors Compensation Fund within EU and out of the EU where applicable [Controllers of personal data];
- External compliance companies within EU and out of the EU where applicable [Processors of data];
- IT and trading platforms administration providers within EU and out of the EU where applicable [Processors of Data];
- Translating Agencies within EU and out of EU where applicable [Processors of Data];
- Communication Support Services within EU and out of EU where applicable [Processors of Data]
- Professional firms within EU and out of the EU where applicable [Processor of Data];
- Auditors within EU and out of the EU where applicable [Processors of Data];
- Card payment processing companies and payment service providers within EU and out of the EU where applicable [Controller of Data];

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- Cloud storage companies within EU and out of the EU where applicable [Processors of Data]

We may share your personal information with a third party of our choosing to request feedback on a product or service you have received from any entity under Holborn Group.

We may contact you via email to invite you to review any services and/or products you received from us [in order to collect your feedback and improve our services [and products]] (the “Purpose”). We use an external company, Trustpilot A/S (“Trustpilot”), to collect your feedback which means that we will share your name, email address and reference number with Trustpilot for the Purpose. If you want to read more about how Trustpilot process your data, you can find their Privacy Policy here: <https://uk.legal.trustpilot.com/end-user-privacy-terms> Holborn Group may also use such reviews in other promotional material and media for our advertising and promotional purposes with your prior consent which can be withdrawn at any time.

Controller

Holborn Group of Companies is the controller and responsible for your personal data.

We have appointed a Data Protection Officer (DPO) of the Holborn Group who is responsible for overseeing questions in relation to this policy statement. If you have any questions about this policy statement, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Our full details are:

Email address: dpo@holbornassets.com.cy

Postal address: 210 Amathountos Boulevard, Pyrgos, Limassol, 4534

Telephone number: +357 25 560 504

You have the right to make a complaint at any time to the Commissioner for Personal Data (CPD), for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the CPD so please contact our DPO in the first instance.

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Changes to the privacy statement and your duty to inform us of changes

We may modify or amend this policy statement from time to time. We will notify you appropriately when we make changes to this privacy statement. We do however encourage you to review this statement periodically so as to be always informed about how we are processing and protecting your personal information.

This version was last updated on 22 September 2021 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

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What Data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are certain types of more sensitive personal data which require a higher level of protection, including but not limited to information about a person's sex, financial condition, medical records, racial or ethnic origin, political opinions, religious or philosophical beliefs, etc. Information about a person's criminal convictions also warrants this higher level of protection.

As part of the Holborn Group's client account opening procedures and ongoing obligations, Holborn Group needs to abide with the legislative framework. Specifically, the Company shall comply with its legal obligations under the EU Directive 2018/1673- 6th Anti-Money Laundering Directive '6AMLD' for the establishment on the Client's economic profile and prevention of money-laundering as well as abide with the relevant record keeping obligations under the European Commission Delegated Regulation (EU) 2017/565 ('Delegated Regulation') and Law 87(l)/2017 as amended by the European Commission Delegated Regulation (EU) 2021/236 of 21 December 2020 and as this will be amended from time to time for establishing the suitability and appropriateness of each Client based on the services offered and recordings of telephone conversations, client transactions, the Foreign Account Tax Compliance Act ('FATCA') and Common Reporting Standard ('CRS')

Holborn Group collect and process data from a number of sources for the following purpose:

We use your personal information in the following ways:

- To provide you with services and information that you request from us.
- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- To get quotations or arrange investments for you with regulated entities.

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- To comply with our legal and regulatory obligations, co-operate with our regulators and law enforcement agencies and to prevent and detect crime.
- To keep you updated about your investments during regular reviews.
- To improve the quality of our services.
- To check instructions, you've given us or to resolve disputes.
- To process any job application you submit, or that an agency submits for you.
- To tell you (by mail, email, telephone or otherwise) about products and services we think you may be interested in, based on products or services you have shown interest in or may already have. You can opt out of these communications at any time.
- To invite you to event's or provide information that you may be interested in. You can opt out of these communications at any time.
- To confirm your identity and address for business purposes.
- Gathering data to provide management information or other services.
- To administer our sites and for internal operations, including troubleshooting, data analysis, load management, testing, research, statistical and survey purposes.
- To improve our sites to make sure that our content is as effective as we can for you and for your computer.
- As part of our efforts to keep our sites safe and secure and to prevent and detect money laundering, financial crime and other crime.
- To monitor, record, store and use any telephone, email or other communication with you. We'll update your records with any new information you or a third party give us, and we'll add it to any information we already have.
- When you call us, we may retain a copy of the call for security purposes.
- To deal with any enquiries or issues you have about how we collect, store and use your information, or any requests made by you for a copy of the information we hold about you.
- To maintain the client relationship. For instance, if you transfer from one jurisdiction to another your original Holborn's Group adviser may still be able to view your details although no longer provides advice.

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Instances where your personal information might be gathered:

- When you use our website.
- Where you attend one of our events or visit a stand at a show or seminar.
- When you speak to the advisers at one of our offices.
- When you complete a fact find, financial planning questionnaire (FPQ) other application forms
- During a telephone conversation with one of our offices.
- When you are referred to us by your financial adviser.
- From a product provider when you transfer a pension or investment.
- From an existing product provider when they send regular updates on your investments.
- From a product provider via their own client relationship management (CRM) systems or through integration with Holborn's Group CRM systems.
- Subscribe to our service or publications.
- Request marketing to be sent to you.
- Enter a competition, promotion or survey; or give us some feedback.
- When you apply for a job with any company or office under Holborn Group
- When we receive a reference for you relating to a job application.
- Legal basis for processing your data

Our legal basis for collecting, holding and processing your personal information depends on the information that we are collecting and the purpose of use of that information. We will normally only collect personal information from you, your employer, or another third party where one of the following applies:

1. You have given us your consent to hold your data and to send you information that we feel may be of interest to you. You have the right to withdraw your consent and or to opt out of marketing information by contacting us.
2. We need your personal information to perform our legal obligations (for instance where you have received advice from us or are a client of ours, we have responsibilities to maintain your information).
3. We need to process your data for performance of a contract (for instance where you are

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a permanent or temporary employee of the Company).

4. It is in our, or your legitimate interest. These legitimate interests include:

- To provide client services;
- To provide relevant advice to clients and prospective clients;
- To market and develop our business (
- For internal administrative purposes (such as filing of information, etc.)
- To locate, contact and verify beneficiaries
- To clarify aspects relating to a technical tax guide or book

If we rely on our legitimate interests for using your personal information, we will balance this to ensure that our legitimate interests are not outweighed by your personal interests or fundamental rights and freedoms which require protection.

Automated technologies or interactions

As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, [server logs] and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy here for further details

Third parties or publicly available sources

We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from analytics providers such as [Google] and (Facebook) based outside of EU;
- Contact, Financial and Transaction Data
- Identity and Contact Data from individual and publicly available sources, such as Registrar of Companies based inside EU and Thomson Reuters based outside of EU.

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We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, maiden name, last name, proof of identity, username or similar identifier, marital status, title, date and place of birth and gender, country of residence and citizenship.
- Contact Data includes billing address, delivery address, email address and telephone numbers proof of address,
- Professional Data includes level of education, profession, employer name & work experience.
- Tax Data include country of tax residence and tax identification number.
- Financial Data includes annual income, net worth, source of funds, anticipated account turnover, bank account, bank statements, liabilities, payment card details and copies, E-wallet information.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us, deposit methods, purpose of transactions with us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

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If you fail to provide personal data

We need to collect your personal data as part of statutory obligations or as part of the contractual arrangements we have with you. If you fail to provide that data when requested, we may not be able to perform our contractual obligations or to enter into a contract with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Disclosures of personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 5 below.

- External Third Parties as set out in the Glossary.
- Specific third parties listed in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this policy statement.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please Contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

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Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact (c) Financial (d) Professional (e) Tax	Performance of a contract with you Compliance with legal obligations
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how

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(b) Asking you to leave a review or take a survey		customers use our products/services)
To enable you to participate in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the	(a) Identity (b) Contact	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our

Holborn Group of Companies

Holborn is a group of companies which have separate financial services authorisation in the jurisdictions in which they operate. Clients engage with the specific Holborn group company that operates in their jurisdiction, and it is solely via the regulator in that jurisdiction that they have recourse where applicable.

Holborn Assets Wealth Management (CY) Ltd is licensed by the Cyprus Securities and Exchange Commission (CySEC) (License No.: 394/20) the EEA/EU / Holborn Insurance Agents, Sub Agents & Consultants (Cyprus) Ltd license by the Insurance Companies Control Service (ICCS) (License No: 5228) Archway Private Wealth and Insurance Intermediation Ltd is a trading name of Holborn Insurance Agents, Sub Agents & Consultants (Cyprus) Ltd

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<p>advertising we serve to you</p>	<p>(c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To perform automated decision in order to identify your knowledge and experience in Forex industry and to identify your risk profile (Appropriateness and Suitability Test)</p>	<p>(a) Identity (b) Financial (c) Professional</p>	<p>Necessary to comply with a legal obligation</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

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Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional Offers from Us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information from us or purchased services or products from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Opting Out

You can ask us to stop sending you marketing messages at any time by Contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that you can still access this website and it will function properly. Cookies are used on this website in order to offer our users a more customized browsing experience.

For more information about the cookies we use, please see our Cookie Policy.

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Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please Contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

International Transfers of personal data

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure that an equal degree of protection will be afforded to it 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 which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please Contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

This may happen if any of our Platform providers are located in a 'third country' outside of the EEA. If we transfer your information outside of the EEA in this way, we will take steps to

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ensure that your privacy rights continue to be protected as outlined in this Policy. This may require us to take certain additional steps to ensure that appropriate safeguards are in place if that third country is not deemed by the European Commission to offer an adequate level of protection for your privacy rights, which may include use of contractual safeguards to allow you to be able to enforce your rights and ensure these are preserved. In certain circumstances.

If you use our services while you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those services.

Technical and Operational Security Measures

Holborn Group has put in place appropriate security measures to protect the security of its client's personal data and prevent any unauthorized or unlawful processing, accidental loss, destruction, alteration, disclosure, or damage on Client's personal data. Holborn Group implements appropriate technical and organizational measures such as network traffic encryption, pseudonymization, data encryption, two-factor authentication, access management procedure, tokenization, clean desk policy, business continuity and disaster recovery, IT systems risk assessment, physical and logical access segregation, process in case of personal data breach policy etc. Holborn Group limits access to the Client's personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process the Client's personal data on Holborn's Group instructions, and they are subject to a duty of confidentiality.

Details of these measures are available upon request. In addition, Holborn Group has put in place procedures to deal with any suspected data security breach and will notify the Client and any applicable regulator of a suspected breach where Holborn Group is legally required to do so.

Automated decision-making and profiling

In order to perform its contractual obligations and/or legal obligations Holborn Group might request for the provision of the investment services to you and once per calendar year thereafter, to assess your knowledge and experience, your financial situation and investment objectives and your risk profile. We fulfil the above requirements through the following tools:

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Appropriateness Test: it takes place when you require to register as client of Holborn Group. Hence, we need to check and ensure that you are suitable for the provision of Holborn's Group services and products by taking an appropriateness test in regard to your knowledge, financial background and experience in regard to financial services. Based on the scoring you receive; you will be informed whether you are eligible to receive our services and become our Client and the maximum level of leverage you are eligible to. The reason for assessing your appropriateness is to enable Holborn Group to offer to you services suitable to you and act in the client's best interest.

Suitability Test: it takes place when you request to be offered our investment program here. In this respect you will be required to take a suitability test in order to assess your financial situation, risk profile and risk tolerance as an investor and that the investment program is suitable for you. Based on your scoring, we will be able to assess your investment objectives, if you are able financially to bear any related investment risks consistent with your investment objectives. The reason for assessing your suitability is to enable Holborn Group to act in the client's best interest.

The scorings above are monitored by the Compliance department of Holborn Group and you may see your results and an explanation of the scoring or to challenge the decision by sending an email to Holborn Group. During these processes, Holborn Group takes all the technical and operational measures to correct inaccuracies and minimize the risk of errors, to prevent any discrimination and to secure personal data of the client.

Recording of telephone conversations and of electronic communication

We record, monitor and process any telephone conversations and/or electronic communications between us such as through fax, email, social media, electronic messages, either initiated from the Holborn's Group side or your side. All such communications are recorded and/or monitored and/or processed by Holborn Group, including any telephone conversations and/or electronic communications that result or may result in transactions or client order services even if those conversations or communications do not result in the conclusion of such transactions. The content of relevant in person conversations and/or communications with you may be recorded by minutes or notes. Any such records shall be

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provided to you upon request at the same language as the one used to provide investment services to you.

Data Retention

How long will you use my personal data for?

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 personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised 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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us.

Your legal rights

[Under certain circumstances, you have rights under data protection laws in relation to your personal data:](#)

Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of

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erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

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 information which override your rights and freedoms.

Request the 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 data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Right to withdraw consent 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.

If you wish to exercise any of the rights set out above, please inform the DPO in charge.

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No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

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

Personal Data Breach

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. If you require further information on how we deal with a Data Breach please Contact us.

Questions

If you have any questions which have not been covered in this Policy Statement, or any further concerns regarding the use of Personal Data, please do not hesitate to:

DPO of Holborn Group

Email: dpo@holbornassets.com.cy

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