

About KALIA GEORGIYOU LLC

PRIVACY NOTICE

This Privacy Notice sets out details about the personal data that we, Kalia Georgiou LLC, may collect and process about you.

This Privacy Notice covers:

- Job applicants
- Clients/Potential Clients
- Professionals we engage
- Other parties to a matter
- Marketing recipients
- Third parties we contact for information (or who contact us)

This Privacy Notice is non-contractual, regularly reviewed and may be amended by us from time to time.

THE TYPE OF DATA WE HOLD, PURPOSE OF PROCESSING, LEGAL BASIS, DATA SHARING AND RETENTION PERIODS

We have provided this information in a layered format below to ensure it remains clear and concise. Please click on the sub-heading below that best describes you and this information will be displayed.

JOB APPLICANTS

Types of data we may process

Recruitment Stage

We may process the following information at the recruitment stage:

- Personal contact details including name, address and email;
- Information collected during the recruitment process such as your CV/application (including details of previous work experience, education and references) and answers to any interview/recruitment questions relevant to the role you applied for;
- Recruitment Agencies – we may collect your personal details, details of your application and details of your experience and qualifications from the recruitment agency you applied via.

You are obliged to provide this personal data to us as it is necessary for us to explore potentially entering into a contract with you. If you fail to provide it we may be unable to process your application and, if appropriate, offer you employment.

Conditional Offer/Shortlisted

We may process the following information after you have been shortlisted and/or as part of a conditional job offer:

- Proof of your identity (such as driving licence) and any relevant right to work checks;
- Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies;
- Depending on your role, you may be asked to complete an application for a Basic Criminal Record check which will verify your declaration of unspent convictions.
- We will contact your referees (with express consent), using the details you provide in your application, directly to obtain references.

The above is usually part of a conditional offer of employment and therefore you are obliged to provide this as it is necessary to enable us to enter into a contract with you. Right to work checks and the DBS check are statutory requirements which you are obliged to provide. A failure to provide this may result in us being unable to offer you employment.

The purposes of processing

- For recruitment purposes i.e. to ensure you are suitable for the role being advertised and so we can contact you about this role;
- To comply with legal obligations including right to work checks;
- To seek professional advice/defend claims arising from the recruitment process;

Legal basis for processing

We process your personal data on the basis of consent and/or because it is necessary for our legitimate interests, namely to ensure that you are qualified and suitable for the role you are applying for and to ensure we have a record of the recruitment process for the defence of legal claims.

We process details of your right to work and DBS checks in line with our legal requirements to do so.

Sharing your data

Your data will be shared internally with the recruitment team which consists of HR, the interviewing staff and Partners at the firm, as relevant and their support staff and subordinates where appropriate.

CLIENTS/POTENTIAL CLIENTS

The type of data we hold

- Contact details of those instructing us (such as name, job title, address and email address) or potential clients;
- In some instances, we may require documentation to verify identity including passport or driving licence details for individuals or details of shareholders and directors from Registrar of Companies for organisations;
- Information about the matter you are instructing us on;
- We may also need to process personal data from third parties which are necessary for the performance of the contract with you, for example, where you are an individual instructing us on the sale of a house, we will need to obtain records from the Land Registry confirming your ownership and may also require information from your mortgage provider.

You are obliged to provide this information to enable us to perform our contract or to take steps to enter into a contract with you and to enable us to comply with statutory obligations, such as verifying identity and source of funds for anti-money laundering purposes. If you do not provide this information we may not be able to provide any services to you.

The purposes of processing

To enable us to:

- Perform our contractual obligations (e.g. to contact you, provide advice etc) or take steps to enter into a contract (e.g. provide a cost estimate);
- Preparatory steps to deal with your enquiry to potentially engage you as a client;
- Verify identity and source of funds where legally required to do so (for example, in accordance with anti-money laundering legislation);
- Retain a record for the defence of legal claims or insurance purposes;
- Market services to you (such as legal updates and event invitations) which we consider would be of interest to you;
- Retain a record for the purpose of regulatory audits or audit requests from clients and for external audits/quality checks;

Legal basis for processing

- To perform the contract that we have entered into with you or take steps to enter into a contract (e.g. provide a costs estimate);
- It is also necessary for our legitimate interests (to provide the service efficiently, to maintain accurate records for the defence of legal claims, to retain accreditations and to grow our business);

- To comply with our legal and regulatory requirements including regulatory audits;

Sharing your data

Your data will be shared internally to the extent necessary to carry out our obligations under our contract with you and/or in line with the purposes set out above. Your data may also be shared with our bank as necessary where you are making payments to us.

Your contact details may also be shared with our Marketing team to ensure you are invited to events and provided with legal updates that we believe may be of interest to you. Please note, you have a right to opt out of any marketing communications (see below section on 'Marketing').

We may need to share your data with professional advisers we contract with to obtain advice in relation to the matter you have instructed us on.

We will also share your personal information with third parties where required by law (for example to comply with anti-money laundering legislation) and where it is necessary to administer the working relationship with you (as stated above).

We may also need to share personal data with third parties such as potential buyers of the business where applicable (the recipient of this information will be bound by confidentiality restrictions if the data cannot be anonymised). We are bound by principles of legal privilege and confidentiality and, in line with our professional obligations, will not share your personal data more widely without your explicit consent.

Once we have completed our obligations under our contract with you, your personal data will be archived.

PROFESSIONALS WE ENGAGE

The type of data we hold

This may include lawyers, medical professionals, accountants, tax advisers or other experts.

We will hold your contact details (such as name, email and phone number) and your opinion/advice as per the terms of our contract with you.

You are obliged to provide this information to enable us to perform the contract entered into with you or to make enquiries to potentially engage your services. A failure to provide this information may mean we are unable to enter into a contract with you or may leave you exposed to claims (for example where you enter into a contract but do not provide the advice/report as per the terms of the contract).

The purposes of processing

To ensure we can contact you and you can provide the service contracted or make enquiries to obtain said service. We also retain this data to ensure we have a record of services to establish/exercise/defend legal claims and to assess the provision of future services to you.

Legal basis for processing

This is processed to enable us to perform the contract we have entered into but is also necessary for our legitimate interests (being able to comply with our obligations to our client under our contract with them, maintain a record of advice provided, to assess suitability for instructions and to establish/exercise/defend legal claims) and the legitimate interests of our client (obtaining advice as appropriate). We also process on the basis of consent where you have agreed to provide your services.

Sharing your data

Your data will be shared internally to the extent necessary to carry out our functions under our contract with you and our client. This is likely to include sharing data with our client (on whose matter you are instructed), the lawyer/fee earner responsible for the work, their supervisor and subordinates, together with our IT and Finance teams, where appropriate.

Your contact details may also be shared with other lawyers and support staff at the firm for the purposes of considering future instructions to you.

OTHER PARTIES TO A MATTER

The type of data we hold

Other parties to a matter may include legal or lay representatives, other parties to the claim/dispute/advice, judges, judicial staff, ACAS representatives, shareholders, beneficiaries, medical experts, third party witnesses etc.

We may be informed by you or by a third party (including but not limited to our client, a party to a transaction/claim or a court/Tribunal) of your name and contact details if you are involved on a particular matter we are instructed on.

In these instances, the likely data we will hold on you will be your name, the organisation you work for and your contact details. It may also include information that you have given us or the client and your opinion on matters, for example those captured in pleadings, legal bundles, correspondence and documents relating to the matter we are instructed on, witness statements or medical reports.

You are not obliged by us to provide your personal data, however, you may be subject to regulatory or legal requirements to do so. Failure to provide us with your personal data may impact the effective management of the matter in question.

The purposes of processing

The personal data is processed to ensure we are able to contact relevant parties on a matter and, in some cases comply with professional requirements (i.e. to speak with legal representatives where we are aware they are instructed).

It may also be processed to provide further information relevant to the matter in question (e.g. witness account of events etc).

Legal basis for processing

We process this on the basis of our legitimate interests (to be able to advise our client) and our clients' legitimate interests (to be able to effectively carry out the matter/receive informed legal advice etc).

We may also process this data on the basis of consent (if you have provided these details to us yourself) and where required by law (e.g. pursuant to a court order).

Sharing your data

Your data will be shared internally to the extent necessary to carry out our contract with our client and ensure the smooth running of the matter in question. This is likely to include sharing data with our client, the lawyer/fee earner responsible for the work.

MARKETING RECIPIENTS

Type of data we hold

We may process your personal data including your name, employer, job title and email address for marketing purposes.

In most cases we will have receive this data from you directly when you have signed up for services or events, however, we may also obtain data from publicly available sources (such as your employer's website).

You are not obliged to provide this information, however, if you do not do so we may not be able to provide the services requested (for example, to receive legal updates, we would need a valid email address).

You may opt out of marketing communications by emailing marketing@clarkslegal.com. Alternatively, each of our marketing communications contain an 'opt out' hyperlink so that you can opt out easily at any time.

Purposes for processing

We may process this personal data to send you marketing updates by email (and in some cases by post) such as legal news, new services and event invitations that we believe may be of interest to you or that you have expressly requested.

If you have opted out of marketing updates, we may retain your personal data as a record of those who have opted out to ensure that we do not contact you further for these purposes.

Legal basis for processing

We process this data on the basis of consent and legitimate interests, namely to maintain and grow our business.

Sharing of data

We will always treat your personal data securely and with respect and do not share this with other organisations save where you have expressly asked us to do so.

Your personal data is shared internally with lawyers/fee earners, and our Marketing and IT teams. We may use external marketing companies for marketing purposes, however, we do not envisage needing to share your personal data with them and will only do so if it is necessary for particular tasks assigned to them pursuant to their role. Where fees are charged for a service, our Finance team will also have access to your personal data to the extent necessary to recover payments from you and record your payment record and financial details.

Where you sign up to attend events ordinarily a badge stating your name, job title and organisation (and/or a sign in sheet stating the same) will be on display at the event which others attending the same event may have sight of.

THIRD PARTIES WE CONTACT (OR WHO CONTACT US)

Type of data we hold

We may process your personal data including your name and contact details where you have contacted us (e.g. for information) or where we have obtained your information from a public source or third party and wish to request information. If we receive any communication from you then we will also process any data contained within your request.

An example may be where you are a prospective employer and contact us for a reference or, similarly, where we seek a reference for someone we intend to employ. Another example may be where we contact you to see if you would be interested in hosting a joint event or where we seek to use your business service, vice versa, or where you market to us.

This covers a variety of requests and, in most cases, we do not envisage you being obliged to provide your personal data. If you are requesting information from us, not providing this data may mean we are unable to respond.

Purposes for processing

The purpose of us processing your personal data is to allow us to respond to your request or to seek information.

Legal basis for processing

We process this data on the basis of our legitimate interests. These are likely to include assessing job applicants' suitability for roles and growing our business and network.

Sharing of data

Your data will be shared internally with those parties relevant to the information request. If your request requires this, it may be shared with other external parties.

Please note that if we intend to further process your personal data for a purpose other than that for which it was collected, we shall provide you with information on this other purpose and all other information as set out in this notice.

We will not transfer your personal data to any country outside the European Economic Area without your consent. Information about the transfer and any relevant safeguards will be provided to you in advance of you giving consent.

In terms of retention periods, we will not keep your data for longer than is necessary. When deciding how long to hold your data we have regard to the purposes for which this is processed, legal and regulatory requirements (including any contractually agreed periods) and statutory limitation periods (under which it is prudent for us to retain records for longer periods).

CONSENT

Where we rely on consent to process your personal data, you have a right to withdraw your consent at any time. This will not affect the lawfulness of processing based on consent before its withdrawal.

You can withdraw your consent to our processing at any time by contacting kaliaalaw@logos.com.cy. Please specify the type of processing that you are withdrawing your consent to in your email.

YOUR RIGHTS

You have a number of rights in relation to the personal information that we process about you. You:

- Have the right to be informed about your data (as set out in this Privacy Notice)

- Can request access to your personal data
- Can request that your personal data be rectified if it is inaccurate or incomplete
- Can request that the processing of your personal data be restricted or erased in certain circumstances, for example, where the data is no longer necessary to meet its purpose
- Can object to processing in certain circumstances, for example where this is based on legitimate interests or involves direct marketing.
- Can request to receive personal data that you have provided in a structured, commonly used and machine-readable format and can request to have this transmitted without hindrance where the data is processed on the basis of consent or performance of a contract
- Can lodge a complaint with the Data Protection Commissioner's Office

CONTACT DETAILS

Kalia Georgiou LLC (registered in Cyprus with company no. H.E.301129) can be contacted at 153 Arch. Makarios III Aven., Y Court office 202, 3026 Limassol, Tel: 25737346, Fax: 25389849.

If you have any enquiries re data protection or wish to exercise any of your rights please do contact at kaliialaw@logos.com.cy.