

Privacy Policy

The Cyprus Investment Funds Association (“CIFA”) is committed to protecting and respecting your privacy.

This Privacy Policy explains our approach to any personal information that we collect from you or which we have obtained about you from a third party and the purposes for which we process your personal information. It also sets out your rights in respect of our processing of your personal information. This Privacy Policy will inform you of the nature of your personal information that is processed by us and how you can request that we delete, update, transfer and/or provide you with access to it. This Privacy Policy is intended to assist you in making informed decisions when using our website (www.cifacyprus.org) and/or understand how your personal information may be processed by us.

Information we collect from you

a. Through our website:

CIFA will collect the personal information provided through our Contact Form. Such information is, amongst others, (i) Name and (ii) Email Address.

The collected personal information will only be used in order to communicate back to you and respond to your inquiry made via our web site.

b. Through the “Application for Member registration (Physical Persons)”:

CIFA will collect the personal information as required by the “Application for Member registration (Physical Persons)”. Such information is related to

I. Personal Details

- a. Surname
- b. Name
- c. ID Card/Passport No
- d. Nationality
- e. Date of birth
- f. Professional and Academic qualificat

II. Residence Address

III. Contact Details

- a. Home telephone number
- b. Mobile telephone number
- c. Email address

c. Log Data

We automatically collect log information when you use CIFA’s website (www.cifacyprus.org) even if you have not created a Membership Account to log in. That information includes without limitation: IP address, access times, the page you have viewed or engaged, browser, browser language, domain and other system information, usage statistics, time spent on pages, date and time.

How information is collected

We will always ensure that your Personal Information is obtained lawfully, fairly and in a transparent manner. We will do this by providing you with the necessary information in a clear

manner so that you can determine the purposes for which your information will be used at any given time. We will collect your Personal Information through a number of different channels including, but not limited to, where you directly provide personal details when you:

- Visit our website;
- Become a Member of CIFA;
- Submit enquiries to us (through the 'Contact Us' form in our website) or contact us in general;

Confidentiality and Members' Personal Data Protection

Web page visitors or our Members' personal information is kept by us in accordance with the General Data Protection Regulation ("GDPR") (EU Regulation 2016/679) and the provisions of the Protection of Natural Persons with regard to the Processing of Personal Data and for free Movement of Such Data Law of 2018 (Law No. 125(I)/2018).

For purposes of simplification of the procedures and the administrative co-operation that is required for the examination of an application of membership, CIFA may, through the Internal Market Information of the European Commission ("IMI"), request and obtain information that concerns the applicant, from the Competent Authority of another member state of the European Union, of which the applicant has declared that he/she is a registered member. Further information regarding the operation of the IMI can be found on the relevant web page: http://ec.europa.eu/internal_market/imi-net/.

Storage of Clients' Personal Data

All information provided by the Members of CIFA or the web page visitors, is stored on our secure servers which are located within the European Economic Area (the "EEA"). The EEA consists of all EU members states, plus Norway, Iceland and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards provided by the Law. Hard copies provided by you or other third parties are kept by the Secretary of CIFA and are also stored as such in our secured filing room located at our Cyprus office registered address.

As the transmission of information via the internet is not completely secured, we cannot guarantee the security of the data the Members or visitors transmit to the Website and therefore any transmission is at their own risk. Once the personal information is received, CIFA will use strict procedures and security features to try to prevent any unauthorized access.

How long we will keep your Personal Data

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. We are however required to keep your personal data for a minimum period of five (5) years after the end of our membership relationship in order for us to comply with our anti-money laundering obligations under the European legislation framework.

Sharing Personal data with other third parties

We will not sell or rent any of your personal information to third parties for their marketing purposes without your explicit consent and will only disclose this information in the limited circumstances and for the purposes described in this Privacy Policy. This includes transfers of data to non-EEA member states. Under such circumstances, CIFA shall expressly inform the third party regarding the confidential nature of the information.

Specifically, CIFA may disclose your Personal Information to third parties under the following circumstances:

- If we are required to do so by a regulatory authority of a competent jurisdiction; the police and other law enforcement agencies; security forces; competent governmental, intergovernmental or supranational bodies; competent agencies (other than tax related authorities), departments, regulatory authorities, self-regulatory authorities or organisations and other third parties, including companies affiliated to CIFA, that we have reason to believe it is appropriate for us to cooperate with in investigations of fraud or other illegal activity or potential illegal activity. We will attempt, to make such disclosures on a ‘need-to-know’ basis, unless otherwise instructed by a regulatory authority.
- Disclose necessary information to your agent or legal representative (such as the holder of a power of attorney that you grant, or a guardian appointed for you).

Your Right Under The GDPR

Under the GDPR, you have the following rights, which we will always work to uphold:

- a. The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the contact details provided for at the end of this privacy policy.
- b. The right to access your personal data we hold about you. Further information can be found below.
- c. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. To do this, please make use of the contact details provided for this purpose at the end of this privacy policy.
- d. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Again, you may use the contact details provided at the end of this privacy policy to learn more about this right and to ask for your personal data to be deleted. We are unable to proceed with erasure requests prior to the expiry of the five (5) year period following the closing of your membership account, as such action will affect our ability to comply with our anti-money laundering obligations under the European legislation framework.
- e. The right to restrict (i.e. prevent) the processing of your personal data.
- f. The right to object to us using your personal data for a particular purpose or purposes.
- g. The right to data portability. This means if you have provided personal data to us directly, or we are using it with your consent or for the performance of your contract with us, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h. Rights relating to automated decision making and profiling. We do not use your personal data in this way. Further information about your rights can also be obtained from the office of the Commissioner for Personal Data Protection of the Republic of Cyprus or your local Information Commissioner’s Office.

How To Access Your Data

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the following email address info@cifacyprus.org. There is not normally any charge for a subject access request. If

your request is ‘manifestly unfounded or excessive’ (for example if you make repetitive requests) a fee may be charged to cover for administrative costs in responding.

We will respond to your subject access request within 15 days and in any cases not more than one month from receiving it. Normally, we aim to provide complete response, including copy of your personal data within that time. In some case however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our process.

Cookies

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. The Website uses cookies to distinguish a client from other users of the Website. This helps to provide the client with a good service when browsing the Website.

All cookies used by CIFA on our Website are used in accordance with current cookie Law. Certain features on our website depend on cookies to function. Cookie Law deems these cookies to be strictly necessary.

Information Security

CIFA is committed to handling your information with high standards of information security. We use computer safeguards such as firewalls and data encryption. We enforce physical access controls to our buildings and files, and we authorise access to personal information only for those employees who require it to fulfill their day-to-day operations.

Legal Disclaimer

CIFA reserves the right to disclose your personally identifiable information as required by rules and regulations and when we believe that disclosure is necessary to protect our rights and/or to comply with any judicial and/or other proceedings, court order, legal process served or pursuant to governmental, intergovernmental and/or other regulatory bodies. CIFA shall not be liable for misuse or loss of personal information and/or otherwise on the company’s website(s) that CIFA does not have access to or control over.

Contact

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to CIFA via e-mail on: info@cifacyprus.org.