

## Privacy Policy

We aim to protect your privacy and care about the way in which your personal data is treated.

This Privacy Policy describes the way Renovi (“Renovi” “we”) approach the collection and processing of personal data from you and the reasons for using such data. This Policy also informs you of your rights in respect of our processing of your personal data.

### What personal data we collect about you

We may collect only the most relevant, proportionate for each purpose and the strictly necessary personal data from you through your use of our website, when you contact or request information from us, or when you engage us in any way.

The personal data that we collect, and process includes but is not limited to:

- Basic information including your name, surname (including name prefix or title), job title and/or position and/or role and your relationship to a person.
- Contact information including the company you work for, telephone(s) (including mobile telephone number where provided) and email address.
- Social media account, where appropriate, and likes, posts, tweets and other interaction with our social media presence.
- Demographic information such as your postal and/or other addresses, preferences and interests.
- Technical information: when you access this website and our technology services being IP address, browser type and version (e.g. Google Chrome, Internet Explorer, Firefox, Safari etc.), time zone setting, browser plug-in types and versions, operating system you are using (e.g. Vista, Windows XP, MacOS, etc.), device type, hardware model, MAC address, unique identifiers and mobile network information.
- Online data: when you access this website and our technology services, information about your visit including URL clickstream to, through and from our website (including date and time), information about your network as such as information about devices, nodes, configurations, connection speeds and network application performance; pages viewed or searched for, page response times, download errors, length of visits and interaction information (such as scrolling, clicks, mouse-overs) and whether you click on particular links or open our emails.

This is a non-exhaustive list which is reflective of the varied nature of the personal data processed as part of a law firm providing legal services.

The reason we collect personal data from you is to help us:

- verify your identity
- send you our newsletter and updates
- carry out and respond to requests made by you
- comply with any applicable law, court order, other judicial process, or the requirements of a regulator

- protect the rights, property or safety of us or third parties, including our other clients and users of the website, and
- use as otherwise required or permitted by law.

#### **How we obtain your personal data**

- We collect your personal data while monitoring our technology tools and services, including our website and email communications sent to and from Renovi. We gather information about you when you provide it to us, or interact with us directly, for instance engaging with our staff, visiting our website, subscribing to our newsletter, sending emails to our staff, or through our social media.
- We may collect or receive information about you from other sources, such as keeping the contact details we already hold for you accurate and up to date using publicly available sources.

#### **How we use your personal data**

We collect and process personal data about you in many ways, including through your use of our website. We use that information:

- To provide and improve this website, including auditing and monitoring its use
- To provide and improve our services to you and to our clients
- To provide information requested by you
- To promote our services, including sending updates, publications, newsletters, and details of events
- To manage and administer our relationship with you and our clients
- To fulfil our legal, compliance & regulatory and risk management obligations, including establishing, exercising or defending legal claims
- To comply with any legal obligations imposed upon us.

#### **On what basis we use your personal data**

It is necessary for us to use your personal data;

- As it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that we provide our services to you and our clients in the best way that we can.
- As it is our legal obligation to use your personal data to comply with any legal, compliance or regulatory obligations imposed upon us.

#### **How long we keep your personal data**

For visitors to our website, we will retain relevant personal data for at least five (5) years from the date of our last interaction with you and in compliance with our obligations under the EU General Data Protection Regulation, or for longer if we are required to do so according to our regulatory and/or compliance obligations or professional indemnity obligations.

#### **Who we share your personal data with**

We may share personal data with a variety of the following categories of third parties as necessary:

- Our professional advisors such as our affiliated corporate services and administration providers, lawyers and accountants.
- Our subsidiary, holding or affiliate companies (Group companies).
- Government or governmental agencies, regulatory authorities, courts and law enforcement agencies. We may be required to disclose your information to comply with legal or regulatory requirements. We will use reasonable endeavours to notify you before we do this, unless we are legally restricted from doing so.
- Professional indemnity or other relevant insurers.
- Regulators/tax authorities/corporate registries.
- Screening service providers: so that we can comply with legal and compliance obligations in relation to the prevention or protection of crime, anti-money laundering, sanctions screening and other required checks.
- Advertising networks: to support and display ads on our website, apps and other social media tools.
- Third parties involved in hosting or organising events or seminars.
- Please note this list is non-exhaustive and there may be other examples where we need to share with other parties in order to provide our services as effectively as we can.

We do not sell, rent or otherwise make personal data commercially available to any third party, except with your prior permission.

### **How we protect your personal data**

We use a variety of technical and organisational measures to help protect your personal data from unauthorised access, use, disclosure, alteration or destruction consistent with the applicable data protection laws and the EU General Data Protection Regulation. We have also implemented appropriate information security policies, rules and technical measures to secure your personal data collected by us. Your personal data is saved in an encrypted form.

All of our partners, employees, consultants, workers and data processors (i.e. those who process your personal data on our behalf), who have access to, and are associated with the processing of personal data, are obliged to respect the confidentiality of such personal data.

### **Which countries we transfer your personal data to**

In order to provide our services we may need to transfer your personal data to locations outside the jurisdiction in which you provide it or where you are viewing this website for the purposes set out in this privacy policy. This may entail a transfer of your information from a location within the European Economic Area (the "EEA") to outside the EEA, or from outside the EEA to a location within the EEA. The level of information protection in countries outside the EEA may be less than that offered within the EEA. Where this happens, we will implement appropriate measures to ensure that your personal data remains protected and secure in accordance with applicable data protection laws and the EU General Data Protection Regulation.

### **Cookies**

Our website uses and might use cookies. Please see our Cookies Policy [\[LINK\]](#).

You may refuse the use of cookies or withdraw your consent at any time by selecting the appropriate settings on your browser but please note that this may affect your use and experience of our website. By continuing to use our website without changing your privacy settings, you are agreeing to our use of cookies. To find out more about cookies, including how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org) and read our Cookies Policy.

### Your rights regarding your personal data

You have the following rights in relation to the personal data we hold about you. Please note that some of these rights will only apply in certain circumstances and some of them may be limited where we have an overriding interest or legal obligation to continue to process the data or where data may be exempt from disclosure due to reasons of confidentiality obligations.

- **Access:** you are entitled to ask us if we are processing your data and, if we are, you can request access to your personal data. This enables you to receive a copy of the personal data we hold about you and certain other information about it;
- **Correction:** you are entitled to request that any incomplete or inaccurate personal data we hold about you is corrected;
- **Erasure:** you are entitled to ask us to delete or remove personal data in certain circumstances. There are also certain exceptions where we may refuse a request for erasure, for example, where the personal data is required for compliance with law or in connection with claims;
- **Restriction:** you are entitled to ask us to suspend the processing of certain of your personal data about you, for example if you want us to establish its accuracy or the reason for processing it;
- **Transfer:** you may us to help you request the transfer certain of your personal data to another party;
- **Objection:** where we are processing your personal data based on legitimate interests (or those of a third party) and you may challenge this. However, we may be entitled to continue processing your information. You also have the right to object where we are processing your personal data for direct marketing purposes;
- **Automated decisions:** you may contest any automated decision made about you where this has a legal or similar significant effect and ask for it to be reconsidered.
- **Consent:** where we are processing personal data with consent, you can withdraw your consent.

If you want to exercise any of these rights, please contact us at [info@renovi.io](mailto:info@renovi.io) You also have a right to lodge a complaint with a Data Protection Supervisory Authority, in Cyprus, where you are habitually resident, or where an alleged infringement of Data Protection law has taken place.

### Our Marketing Policy

You have the right to object where we are processing your personal data for direct marketing purposes. This means you can opt-out of receiving direct marketing from us at any time.

We may use the information you give us on our website or other means for direct marketing purposes to provide emails, newsletters and other messages to keep you informed of developments within the cryptospace and our project, market insights and of our services including events that we think may interest you.

You can opt-out of receiving direct marketing from us at any time. You can do this by clicking on the “unsubscribe” link included at the end of any marketing email we send to you, or by contacting us at [info@renovi.io](mailto:info@renovi.io)

### **Links to third party websites**

Our website, newsletters, email updates and other communications may, from time to time, contain links to and from the websites of others. The personal data that you provide through these websites is not in any case subject to this Privacy Policy and the treatment of your personal data by such websites is not our responsibility.

You should consult the other websites’ Privacy Policy notices which will set out how your information is collected and processed when visiting those websites, as we have no control over information that is submitted to, or collected by, these third parties.

### **Children**

We do not knowingly collect information from children or other persons who are under 16 years old. If you are under 16 years old, you may not submit any personal data to us.

### **Changes to this Policy**

We may make changes to this Privacy Policy from time to time. To ensure that you are always aware of how we use your personal data we will update this Privacy Policy from time to time to reflect any changes to our use of your personal data. We may also make changes as required to comply with changes in applicable law or regulatory requirements. Where it is practicable, we will notify you by email of any significant changes. However, we encourage you to review this Privacy Policy periodically to be informed of how we use your personal data.

Subject to the generality of any other clause in this Privacy Policy, we inform you that the Website will develop for the Renovi project with further functionalities and a privacy policy with more extensive provisions will govern the kind and scope of personal data we process and the way we process them. You are required to read that privacy policy before using our Website and the services thereof.