

KEO GENERAL DATA PROTECTION PRIVACY POLICY

We KEO Plc (“we”, “our”, “us”) collect and process personal data, as defined in the General Data Protection Regulation (“GDPR”), of our customers, suppliers, employees, contractors, agents, website users and other third parties (“you”).

We are data controllers, as defined in the GDPR, as we are responsible for deciding how we hold and use personal information about you.

This data protection policy describes how we collect and use personal information about you during and after the contractual, commercial or any other kind of relationship with us, in accordance with the GDPR, any national implementing laws, regulations and secondary legislation.

We are committed to protecting the privacy and security of your personal data and shall at all times comply with the applicable data protection laws when collecting and processing your data. This means that the personal data we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you;
2. Where we need to comply with a legal obligation;
3. 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;
4. Where you provided your consent.

We may have to share your data with third parties, including third-party service providers and other entities in our group in order to provide our services and manage our business but shall always do so in compliance with applicable data protection laws. We require third parties to respect the security of your data and to treat it in accordance with the law.

All our third-party service providers and all other third party entities, other than those which we are required under the law to disclose your personal information, are required to take appropriate security measures to protect your personal information in line with our policies and relevant contractual data sharing obligations. We do not allow our third-party service providers to use your personal data for their

own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions as per the GDPR.

We will only retain your personal information for as long as is necessary to fulfill 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.

Security of personal data

We have put in place appropriate security measures to prevent unauthorized loss, use or access to your personal data, modification or disclosure. In addition, we restrict access to your personal data to employees, and other third parties who have business reasons to know this information. They will process your personal data only in accordance with our instructions and are subject to confidentiality obligations.

We have established procedures for dealing with any data breaches and will notify you and any supervisory authority of a potential breach where we will be legally obliged to do so.

The obligation to inform us of any changes

It is important that the personal data we collect about you is accurate and up-to-date. Please let us know if there is any change to your personal data during our contractual relationship.

Right of access, correction, deletion and restriction

In some instances, in accordance with the applicable laws, you have the right to access your personal data, ask for its correction or deletion, prohibit or restrict its processing, withdraw your consent where processing is based on consent and even request the transfer of your data to third parties.

If you wish to check, verify, correct or request the deletion of your personal data, oppose the processing of your personal data or request to transfer a copy of your personal data to third parties, please contact via email to keo@keogroup.com.

You also have the right to file a complaint with the Office of the Personal Data Protection Commissioner. The contact details of the Office of the Data Protection Commissioner are as follows:

1 Iasonos Road

1082 Nicosia, Cyprus

Phone: +357 22 818 456

Fax: +357 22 304565

E-mail address: commissioner@dataprotection.gov.cy