

Privacy Policy

Goneus Holdings LTD

Effective Date: August 2025

I. Introduction

This Privacy Policy outlines how **Goneus Holdings LTD (“the Firm”)** collects, processes, and protects personal data of clients, affiliates, and other individuals. This policy is compliant with Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR) and Law 125(I)/2018 of the Republic of Cyprus.

II. Data Collected and Processed

The Firm may collect and process the following categories of personal data, depending on the nature of services provided:

1. Contact information (e.g., full name, address, email, phone, fax)
2. Identification and due diligence documents (e.g., passports, utility bills, tax IDs, employment info, marital status, nationality, PEP status, criminal records)
3. Service-related information (e.g., professional background, legal matters, financial assets, court proceedings)
4. Financial data (e.g., bank account details, payment records)
5. Visit records (e.g., visitor logs, meeting attendance)

Any other data necessary to provide the Firm’s services

III. How Data is Collected

Personal data may be collected directly or indirectly in the following ways:

1. When a client requests legal or corporate services
2. When visiting, enquiring, or interacting via the Firm’s website
3. From third-party service providers or representatives
4. From publicly available sources or authorities when legally permitted

IV. Purpose of Processing

Personal data may be processed for the following purposes:

1. Service provision & client onboarding – To establish or perform a contract or based on client consent. Consent may be withdrawn at any time by contacting the DPO.
2. Compliance obligations – For legal duties such as anti-money laundering, KYC, and tax reporting.
3. Security measures – CCTV use on premises is for safety and security. Entry constitutes consent to this policy.
4. Legal & regulatory compliance – To meet obligations under applicable laws and court orders.
5. Internal training and quality assurance
6. Client communication – Following up on enquiries, complaints, or feedback
7. Marketing (where applicable) – Only with prior explicit consent. Users may unsubscribe at any time.
8. IT and data protection services – Including encryption, cloud storage, and access by vetted IT providers.

9. Other lawful purposes – Where required by law or client agreement.

V. Recipients of Personal Data

Personal data may be shared with:

1. The Firm's employees and consultants
2. Affiliated service providers (e.g., accountants, lawyers, notaries, registries)
3. Government and regulatory bodies (e.g., Registrar of Companies, Tax Department)
4. Banks, financial institutions, or courts as required
5. Third parties for due diligence, risk assessment, and fraud prevention
6. Other parties as authorised by the client or under legal obligation

VI. Personal Data of Third Parties

Where clients share personal data of third parties (e.g., employees, directors, family members), they must ensure such disclosure is lawful and that the third party is informed of this Privacy Policy.

The Firm disclaims liability for any unauthorized disclosure by the client.

VII. Failure to Provide Data

If required personal data is not provided, the Firm may be unable to offer services or comply with regulatory obligations. In such cases, clients will be informed of the consequences.

VIII. Client Rights

Clients and data subjects have the following rights under GDPR:

1. Right to information – About data processing practices
2. Right of access – To personal data held
3. Right to rectification – Of inaccurate or outdated data
4. Right to erasure – In specific legal scenarios ("right to be forgotten")
5. Right to restrict processing – Under certain conditions
6. Right to object – To processing for marketing or other purposes
7. Right to data portability – To receive or transmit data electronically
8. Right to withdraw consent – At any time, where processing is based on consent
9. Right to lodge a complaint – With the Data Protection Commissioner in Cyprus

To exercise any of these rights, please contact our Data Protection Officer (DPO).

IX. Updating Personal Data

Clients must promptly notify the Firm of any changes to their personal data. The Firm is not responsible for issues arising from outdated or incorrect information.

X. Complaints

If you have concerns regarding the handling of your personal data, you may contact:

Data Protection Officer

Email: mypropertiescy@gmail.com

You may also lodge a complaint with the relevant government body.

XI. Changes to the Privacy Policy

The Firm may update this Privacy Policy periodically to comply with changes in the law or our practices. The most recent version will always be available on our website at: <https://goneusmanagement.com/>

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