

# Privacy Policy

## 1. Introduction

For KM Bluebridge Limited ("**BlueBridge**"), data security and privacy are of utmost importance. This Privacy Policy describes our commitment to protect the privacy of individuals/data subjects in accordance with EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter called the "**General Data Protection Regulation**" and/or "**GDPR**") and any other applicable data protection laws (collectively "**Data Protection Legislation**"). We recommend that you read this Privacy Policy in full to ensure you are fully informed.

In this Privacy Policy, we Bluebridge explain how we collect and process personal data. This Privacy Policy also sets out the rights of the individuals in respect of the personal data that Bluebridge holds and processes.

The term "personal data" is here deemed to include all information referring to an identified or identifiable person.

If you provide us with personal data of other persons (e.g. family members or work colleagues) or on behalf of other persons, please make sure that these persons are aware of this Privacy Policy, and provide us with their personal data only if have to do so or you have received their authority and such personal data is correct.

## 2. Our Commitment

Bluebridge Ltd is in the business of assisting its clients with Dac 6 reportable solutions and in doing so it commits to ensure that any personal data of a data subject collected during this process is protected.

## 3. Who will process the personal data?

Bluebridge services are provided by Bluebridge Ltd (company registration number: HE 405123 with registered address 50 Spyrou Kyprianou Avenue Irida Tower 3, 5<sup>th</sup> Floor Larnaca Cyprus), a company registered under the laws of the Republic of Cyprus and who acts as a controller in the meaning of the Data Protection Legislation.

## 4. What kind of personal data do we process?

### a) Data that you provide to us

In order to download the impact assessment form, you submit some non-encrypted identification and contact data (name, email address, company and location) as part of a registration process. The data that we request at the time of registration is necessary for the provision of our services.

When you register with us to purchase any of the three **BlueBridge services**, you submit non-encrypted identification and contact data (name, email address, address,

telephone, payment details and any other data you may provide to us). The data that we request at the time of registration is necessary for the provision of our services.

In order for BlueBridge to provide any of the three **BlueBridge services**, personal data of third party individuals will be provided by you. BlueBridge is not responsible for confirming whether you have received the authority of the third party individuals to provide BlueBridge with such persona data and shall bear no responsibility in the event you have not obtained the necessary authorization from such third party individual. You must make such third party individual aware of this Privacy Policy. This responsibility lies with you. Further, it is your responsibility to ensure the accuracy of the personal data provided to BlueBridge with respect to the third party individual.

We may process your personal data where this is necessary in order to comply with regulatory requirements such as client identification and knowledge, money laundering prevention and abatement of terrorism financing and fraud prevention arising from the Prevention and Suppression of Money Laundering and Terrorist Financing Law of 2007, as amended, or any other laws and regulations applicable in the Republic of Cyprus as well as any regulations issued by a competent organ of the European Union), always aiming to observe the conditions imposed by the Data Protection Legislation on the lawfulness of personal data processing.

**b) Information that we collect about you on our website**

When you visit our website, we and our partners may automatically collect, store and use technical information about your equipment and interaction with our website; this information is sent to us from your computer, smartphone, tablet or other device used to visit our website using a variety of cookies. For detailed information about the personal data we collect via our website and the use of cookies in the website, please read the Online Data Protection Policy: <https://bluebridgelimited.com/en/data-protection-policy/> and the Cookie Policy: <https://bluebridgelimited.com/en/data-protection-policy/>.

**c) Information from publicly accessible sources**

To such a degree as it is permitted to us, we also obtain certain data from publicly accessible sources (e.g. debt registers, land registries, commercial registers, press, internet) or we may receive such information from affiliated companies of BLUEBRIDGE, from the authorities or other third parties, such as the providers of background checks. Insofar as these third parties are themselves wholly or partly responsible for the processing of these data, their data protection regulations apply additionally (e.g. the data protection regulations of LexisNexis, available at <https://www.lexisnexis.com/global/privacy/de/article-14-bis.page>).

**5. What is the legal basis for processing?**

We collect and process personal data only where we have legal basis for doing so under the the Data Protection Legislation. This means we collect and use personal data only where:

- It is necessary in order to provide any of the BlueBridge Services, including to set up and maintain a BlueBridge account and to provide customer support;
- It satisfies our legitimate business interest (only if it is fair and reasonable to do so and our legitimate business interest is not overridden by the interests of the data subject);
- You give us consent to do so for a specific purpose; or
- It is needed in order to comply with a legal obligation.

## **6. How do we use the personal data?**

Personal data is processed depending on the BlueBridge service purchased.

## **7. Services**

We will use personal data, such as registration and account information for the provision and maintenance of your BlueBridge user account, for authentication purposes and for providing the BlueBridge service(s).

## **8. Billing**

BlueBridge will process registration and billing information for billing purposes ie to complete the transaction and to send related information, including purchase confirmations and invoices. BlueBridge has partnered with Six Payment Services (Europe) S.A., 10, rue Gabriel Lippmann, L-5365 Munsbach which is a payment service provider to help us process your online BlueBridge service order. In the future we may use other payment service providers and will update this Privacy Policy accordingly.

We will not store or collect payment card details. That information is provided directly to Six Payment Services whose use of personal data for the purpose of processing the payment is governed by their privacy policy.

## **9. Communications**

In general, we receive your personal data where you provide this on a voluntary basis, and there will typically be no detrimental effect for you if you wish not to provide this or otherwise withhold your consent for it to be processed. However, there are certain cases where we will unfortunately be unable to act without receiving such data, for example where we require such data to process your instructions or orders. Where it is not possible for us to provide you with what you request without the relevant personal data, we will let you know accordingly.

When engaging us to provide any of our services, you may consent to receiving updates, support and administrative messages (for example, we will send messages

about how to use the BlueBridge services and we may communicate with you about your BlueBridge account and provide customer support to perform our contract with you for the use of the BlueBridge services). You may opt out of receiving updates, support and administrative messages, but please note in this case, it might be more difficult for our customer support team to find a problem if something goes wrong.

Further, we may communicate with you via telephone or e-mail where necessary within the scope of providing any of the BlueBridge services you have engaged us to perform. Such telephone communication may be recorded for the purpose of improving the services we provide.

### **10. Protecting our legitimate business interests and legal rights**

Where required by law or where we believe it is necessary to protect our legal rights, interests and interests of others, we use information about you in connection with legal claims, compliance, regulatory and other legal requirements.

### **11. Other purposes**

BlueBridge may process your data for any other purposes for which we obtain your consent where necessary or otherwise in accordance with the Data Protection Legislation and this Privacy Policy.

### **12. Do we share your personal data with third parties?**

We will share personal data with third parties only in accordance with this Privacy Policy. We will never sell personal data to third parties, however, we may need to share some information, including personal data, in the following circumstances:

#### **1) Complying with legal requirements**

BlueBridge may transmit personal data if the applicable legal provisions so require, or when such action is necessary to comply with the applicable laws. We may also need to share personal data for the protections of BlueBridge rights and interests, to protect the user's safety or the safety of others or to investigate fraud, in accordance with the applicable laws.

#### **2) Using third- party service providers**

In certain cases, we need to share information, including personal data with our third party service providers. We use third party service providers for a number of services including backup, payment processing and other services. The current list of our service providers is as follows.

In particular, the following categories of recipients may be concerned:

- our service providers (within BlueBridge, or externally, e.g. banks, insurance companies), including processors (e.g. IT providers);

- registered agents in countries in which they are prescribed by law, provided we are supporting you at your request in the country in question in connection with the incorporation and/or administration of a company;
- dealers, suppliers, sub-contractors and other business partners;
- clients;
- domestic and foreign authorities, government office or courts;
- the media;
- the public, including users of our websites and social media;
- competitors, industry organisations, associations, organisations and other bodies;
- acquirers or parties interested in the acquisition of business divisions, companies or other parts of BlueBridge;
- other parties in possible or actual legal proceedings;

all together “Recipients”.

### **13. Where do we transfer your data?**

BlueBridge is a company organized under the laws of Cyprus and personal data collected is primarily stored within the EEA. Personal data may be transferred to countries outside the EU and/or transferred to the Recipients which might domiciled outside the EU. These countries might have not have an adequate data protection level. In such an event we shall implement the necessary measures to ensure compliance with the Data Protection Legislation (e.g. the applicable EU Standard Contractual Clauses, etc.).

### **14. How do we protect the personal data we receive?**

BlueBridge takes the appropriate technical and organization measures to protect personal data against accidental or unlawful, destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

### **15. How long will we retain information?**

BlueBridge will retain personal data for as long as necessary to fulfill the services provided as well as the purposes specified above, unless a longer retention period is required or permitted by law (tax, accounting, or other legal requirement).

When we are no longer required to retain the personal data BlueBridge will safely delete or destroy the personal data.

When you delete your account with BlueBridge and you request for personal data to be deleted, BlueBridge will safely delete or destroy the personal data.

### **16. Your privacy rights**

You have certain rights regarding how we use and keep your personal data. These are:

- (1) The right to information: the right to be informed about the contact details of BlueBridge, the purposes of processing, the categories of data processed, the recipients of the data, the existence of the rights provided by the GDPR and the conditions in which the same can be exercised;
- (2) The right to access to personal data: the right to access the personal data we use and process about you;
- (3) The right to rectification: the right to request and obtain inaccurate data rectification, as well as the completion of incomplete data, concerning you. Please note that BlueBridge takes reasonable steps to check the accuracy of and correct the information, even in case this right is not exercised by you. Nevertheless, please let us know if any of your information changes so that we can keep it accurate and up to date;
- (4) The right to data deletion: the right to request the deletion of your personal data where there is no compelling reason for its continued processing by BlueBridge;
- (5) The right to restriction of processing: the right to 'block' or suppress the processing of your personal data;
- (6) The right to object: the right to object at any time the processing of your personal data, for grounded and legitimate reasons;
- (7) The right to data portability: the right to receive personal data concerning you in a structured manner, commonly used and easily readable format, as well as the right that these data be transmitted by us to another data controller;
- (8) The right not to be subject to an automated decision: the right to request and obtain withdrawal, cancellation or reassessment of any decision based exclusively on processing by automated means which produces legal effects or similarly affects you to a significant extent;
- (9) The right to lodge a complaint with an authority or to address justice: the right to complain to the relevant privacy regulator for personal data processing and the right to address the courts for the defense of any rights guaranteed by the Data Protection Legislation which have been violated. We can provide you with the details of the relevant regulator upon request.

Please note that under the Data Protection Legislation these rights are subject to certain conditions. You can learn more for exercising any of these rights by contacting us at [hello@bluebridgelimited.com](mailto:hello@bluebridgelimited.com)

To enable us to process your request, we will require you to provide satisfactory proof of your identity in order to ensure that your rights are respected and protected. This is to ensure that your personal data is disclosed only to you.

## **17. Withdrawal of consent**

In cases where the processing of personal data is based on consent, you can withdraw your consent at any time by sending an email to [hello@bluebridgelimited.com](mailto:hello@bluebridgelimited.com). If consent is withdrawn, we will no longer process the personal data for the relevant purpose.

### **18. Changes to this Policy**

We constantly strive to improve our services in an attempt to keep users satisfied. Sometimes these improvements will require change. Due to the ongoing changes in the law and changing nature of technology, data practices are changing from time to time. BlueBridge reserves the right to alter or modify this policy when necessary. If there are any changes to this policy, you will be notified 30 days prior to the change becoming effective. Changes will take effect as soon as the revised version is made available on our website. We encourage you to periodically review this page for the latest information of our privacy practices.

This Privacy Statement is governed by Cyprus law.

This Privacy Statement was last updated on 3 February 2021. For any complaints or further information please contact us at [hello@bluebridgelimited.com](mailto:hello@bluebridgelimited.com).