

**Effective Date:** 20/05/2021

This **Privacy & Cookies Policy** outlines the details of processing any data of you, following your use of this website (“site”), of Cydris Fund Services Limited (“we” or “us” or “our”). As a user of this site and following the *European Union (“EU”) General Data Protection Regulation of the European Parliament and of the Council, of 27 April 2016 (“GDPR”), the Cyprus Law 125(I)/2018 of 31 July 2018, providing for the protection of natural persons with regard to the processing of personal data and for the free movement of such data, and any other applicable privacy and data protection legislation, and all their amendments from time to time*, you need to be aware of this site’s processing undertakings concerning your data.

## **1. What data of you does this site collect?**

Be aware that this site *DOES NOT* collect any data of you, without your prior consent.

This site uses Google Analytics, hence Google Analytics Cookies as well.

Google Analytics Cookies are created every time you visit this site because a valid Google Analytics code has been installed and fired on this site. However, Google Analytics Cookies will only be activated if you provide your consent, according to section 4.

Be aware that Google Analytics sets a different set of cookies for each browser. This means that if you visit this site via two different web browsers, Google Analytics will set a different set of cookies for each, but in all cases to collect data for the purposes outlined in section 2.

Google Analytics Cookies are files created whenever you visit this site. If you provide your consent, according to section 4, the Google Analytics Cookies we use, are activated to store information about your interactions with this site (listed below). In general, they collect visitor-level custom variable data, which means that data is collected every time you visit this site (given that you have provided your consent according to section 4) and by every page of this site you view. They are created when the JavaScript library is executed and they are updated every time data is sent to Google Analytics.

Be aware that the basic / standard information that is collected refers to:

- The total time you spend on this site;
- The time you spend on each page of this site and in what order you visit pages;
- What internal links you have clicked on this site, which may be derived from the URL of the next pageview.

Additionally, from your Internet Protocol (“IP”) address, user agent string and initial page inspection, Google Analytics may also infer the following information:

- Your geographic location;
- What browser and operating system you are using;
- Your screen’s size and whether you have Flash or Java installed;

- The referring site.

## **2. What are the purposes for any data of you this site collects?**

Be aware that any data of you Google Analytics collects through the Google Analytics Cookies this site uses is *ONLY* used for statistical and functional purposes.

Data through which you may be identified are collected to assist in the fulfillment of the above-mentioned purposes. For instance, in order for Google Analytics to provide us with accurate statistics for the number of users that visit this site in a defined period, it must be recognized which users are new and which are returning.

Have in mind that:

- If you email Cydris Fund Services Limited at [info@cydris.com](mailto:info@cydris.com), this site does not collect any data of you, nor is the content of your email in any way shared with this site or Google Analytics;
- Similarly, if you submit a message through the “Contact Us” page of this site, this site does not collect any data of you, nor is the content of your message in any way shared with this site or Google Analytics. Your message is directly delivered to [info@cydris.com](mailto:info@cydris.com).

## **3. Who has access to your data this site collects?**

Be aware that *ONLY* Google Analytics has access to your data and may process and store them.

As soon as you consent (according to section 4) for this site to activate its use of Google Analytics Cookies, they start to collect data of you. This data is directly collected, processed and stored by Google Analytics and not by Cydris Fund Services Limited, nor by any online or other type of server / database that belongs to us.

## **4. How does this site collect data of you?**

Be aware that you must *ACCEPT* the cookies notification pop-up that appears when you visit this site, in order for Google Analytics Cookies to be activated and start collecting data of you, as per section 1.

Every time you access this site, via any of its pages, a pop-up message appears to notify you about this site’s use of cookies (Google Analytics Cookies).

In order to provide your consent and ALLOW this site to activate its use of cookies while you navigate through, you need to “**Accept**” the notification pop-up.

In order to dissent though and therefore NOT ALLOW this site to activate its use of cookies while you navigate through, you need to “**Reject**” the notification pop-up. In this case, this site will block

the activation of its cookies and thus no data of you will be collected and processed by Google Analytics.

In either case, you have the option to “Accept” or “Reject” the cookies notification pop-up accordingly, at a later stage, whenever you want and as many times as you want, by clicking at the “Cookies” pop-up that will always appear at the bottom right as you navigate through this site. Be aware that if you “Accept” the cookies notification pop-up, at any stage and then “Reject” it, Google Analytics will still hold any data of you collected before rejecting it. The moment you “Reject” it though, Google Analytics will simply stop collecting any more data of you. In the same way, if you “Reject” the cookies notification pop-up at any stage, and then “Accept” it, Google Analytics will only start collecting data of you since the point of accepting it.

Finally, in case you do not “Accept” or “Reject” the cookies notification pop-up as soon as you enter this site, via any of its pages, no cookies will be activated, thus no data of you will be collected by Google Analytics and you will be able to navigate through this site normally. Be aware though that you will always have the option to “Accept” or “Reject” the “Cookies” pop-up that will appear at the bottom right as you navigate through this site.

*If you are recognized as a returning user to this site and you have previously responded to the cookies notification pop-up, it will only appear at the bottom-right as you navigate through.*

#### **5. How long is data of you collected by this site stored for?**

Be aware that if you accept the cookies notification pop-up according to section 4, the Google Analytics Cookies we use, will automatically be activated and stored, for the period that is set as default by the web browser you are using, unless you manually delete them from the settings of the web browser from which you have accessed this site.

On the other hand, be aware that we have applied settings so as for Google Analytics to retain your data it collects, for 38 months.

#### **6. How to opt-out from this site’s use of cookies?**

Be aware that there exist three ways by which you may opt-out of this site’s use of cookies.

- You may “Reject” the “Cookies” pop-up at the bottom right as you navigate through this site. Hence, Google Analytics Cookies will be blocked and will not collect any more data of you;
- You may manually delete cookies via the settings of the web browser you are using to access this site. You may delete all cookies, or cookies this site is using;
- You may manually block cookies via the settings of the web browser you are using to access this site. In this way, you may block your web browser from using any cookies, or you may block your web browser from using cookies of this site.

## **7. Whom should you contact for any queries in relation to this site's processing of your data?**

If you have any queries or suggestions in relation to this Privacy Policy, you may send an email to our internal Data Protection Officer ("DPO"), at [dpo@cydris.com](mailto:dpo@cydris.com). Be aware that we will try our best to respond the soonest possible as soon as we receive your email.

## **8. What are your rights as users of this site?**

Be aware that as a user of this site, you may exercise the following rights if you accept our cookies notification pop-up, according to section 4:

- You may email us at [dpo@cydris.com](mailto:dpo@cydris.com) in order to request for your data retained by Google Analytics to be erased prior the 38-month period. In such a case, we will require you to provide us with your public IP address, in order for Google Analytics to identify you and find your data. It depends though on the device of your internet service provider. If it uses a Static IP address, this means that it does not change and as long as you provide us with that, Google Analytics will be able to find and delete all of your data. Otherwise, if it uses Dynamic IP addresses, then it means that it will change randomly every time you connect to the internet and Google Analytics will be able to find and delete the data relevant to the latest IP address;
- You may revoke your consent of previously accepting our cookies notification pop-up. You may revoke your consent by rejecting the "Cookies" pop-up at the bottom right as you navigate through this site. This way, you will block Google Analytics Cookies and no more data of you will be collected. In addition to that, if you wish, you may manually deleting or block the cookies of this site from the settings of the web browser by which you have accessed this site and you can email us at [dpo@cydris.com](mailto:dpo@cydris.com) stating that you want your data that Google Analytics retains to be deleted. In your email, you must indicate your public IP address for Google Analytics to identify you and find your data.

Be aware that we will respond to provide you with information on the actions we have taken in respect of your request, within one month as of receiving your request. We will inform you accordingly if we cannot exercise your request within a month, for instance if your request is complex, or if we have a large number of requests to deal with. Again, we will inform you within a month if such an extension in exercising your request is required.

## **9. What about any changes to this Privacy Policy?**

We may update our Privacy Policy from time to time. Thus, we advise you to review this page periodically for any changes. Be aware that any changes are effective immediately, as soon as the updated Privacy Policy is posted on this page. You may determine if our Privacy Policy has been updated since your latest visit, by referring to the "Effective Date" at the top left of this page.