1. Object

The societe anonyme "PITHAGORAS SAMARAS S.A." seated at Athens, Attiki, at 90, Leof. Athinon, tax registration number 094176994, D.O.Y. F.A.E. ATHENS, is committed to protecting the privacy of the individuals that visit our website. The security of their personal information and data is our priority. We will be clear and transparent about the information we are collecting and what we will do with that information.

This Policy sets out the following:

- What personal data we collect and process about you in connection with your relationship with us as a visitor of our website and of our online services;
- Where we obtain the data from:
- What we do with that data;
- How we store the data:
- Who we transfer/disclose that data to:
- Your data protection rights;
- Our compliance with the data protection rules.

All personal data is collected and processed in accordance with Greek and EU data protection laws.

2. Type of personal data we collect

Personal data means any information relating to you which allows us to identify you, such as your name, contact details, and information about your access to our website and mail correspondence.

We may collect personal data from you when you contact us, through the form provided in our website and the use of our website or other websites accessible by our site.

Specifically, we may collect the following categories of information:

- a. Name, home address, e-mail address, telephone number, passport or other recognized personal ID card numbers and details, credit/debit card or other payment details.
- b. Information about your use of our website.
- c. The communications you exchange with us or direct to us via letters, e-mails, calls, and social media.
- d. Location, including real-time geographic location of your computer or device through GPS, Bluetooth, and your IP Address, along with crowd-sourced Wi-Fi hotspot and cell tower locations, if you use location-based features and turn on the Location Services settings on your device and computer.

3. Purposes of using your personal data- storage

Your data may be used for the following purposes:

We will only process your personal data where we have a legal basis to do so. The legal basis will depend on the reasons we have collected and need to use your personal data for:

a. Communication with you. We send you notifications in reference to the requested services. These notifications do not consist advertisement and cannot be exempted.

In most cases we will need to process your personal data to execute your request.

We may also process your personal data for one or more of the following:

- To comply with a legal obligation (e.g. tax and accounting purposes);
- You have consented to us using your personal data;

Additionally please note that only children aged 16 or over can provide their own consent. For children under this age, consent of the children's' parents or legal guardians is required.

We will not retain your data for longer than is necessary to fulfill the purpose it is being processed for. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means.

We must also consider periods for which we might need to retain personal data in order to meet our legal obligations (e.g. in relation to tax and audit reasons) or to deal with complaints, queries and to protect our legal rights in the event of a claim being made.

When we no longer need your personal data, we will securely delete or destroy it. We will also consider if and how we can minimize over time the personal data that we use, and if we can anonymise your personal data so that it can no longer be associated with you or identify you. In this case we may use that information without further notice to you.

4. Securing your personal data

We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction or damage.

The data are protected according to the security policy of our company.

It is possible to notify your data to reliable third parties for the purposes defined in the present Privacy Policy. We demand from all third parties to dispose the proper technical and organizational measures for the protection of personal data, according to the Greek and EU regulations.

5. Sharing your personal data

Your personal data may be shared with the following third parties for the purposes described in this Privacy Policy:

a. Governmental and regulatory authorities and authorities related to the law enforcement.

- b. Trusted service providers we are using to exercise our activities such as e-mail marketing service providers and providers that are managing our website;
- c. Legal and other professional advisors, law courts, if required in case of a potential dispute, or any state or judicial authority in case of an ongoing investigation;
- d. Social media: You may be able to access third party social media services through our website or before visiting our website. When you are registered with your social media account, we will obtain the personal information you choose to share with us through these social media services pursuant to their privacy settings in order to improve and personalize your use of our website. We may also use social media plugins on our website. As a result your information will be shared with your social media provider and possibly presented on your social media profile to be shared with others in your network. Please refer to the privacy policy of these third-party social media providers to find out more about these practices.

6. Use of Cookies

This site uses cookies to enable us to improve our service to you and to provide certain features that you may find useful (<u>click here</u> for ours Cookie Policy). This may include cookies of media and advertising partners that are being placed on your machine when visiting our website. Please visit our partners' websites for information on their privacy and cookie policy.

Cookies are small text files that are transferred to your computer's hard drive through your web browser to enable us to recognize your browser and help us to track visitors to our site; thus enabling us to understand better the products and services that will be most suitable to you. A cookie contains your contact information and information to allow us to identify your computer when you visit our website or use our services. Most Web browsers automatically accept cookies, but, if you wish, you can change these browser settings by accepting, rejecting and deleting cookies. The "help" portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you choose to change these settings, you may find that certain functions and features will not work as intended. The cookies we use do not detect any information stored on your computers.

We use tracking software to monitor customer traffic patterns and site usage to help us develop the design and layout of the websites. This software does not enable us to capture any personal passenger information.

7. Your data protection rights

As provided by the existing legal framework, you have the right to:

- **Request information** about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- Request rectification of the personal information that we hold about you.
 This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to
 delete or remove personal information where there is no sufficient or legal
 reason for us continuing to process it. You also have the right to ask us to
 delete or remove your personal information where you have exercised your
 right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Object to automated decision-making including profiling, that is not to be subject of any automated decision-making by us using your personal information or profiling of you.
- Request the restriction of processing of your personal information. This
 enables you to ask us to suspend the processing of personal information
 about you, for example if you want us to establish its accuracy or the reason
 for processing it.
- Request transfer of your personal information in an electronic and structured form to you or to another party (commonly known as a right to "data portability"). This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.
- Withdraw consent. Where you may have provided your consent to the
 collection, processing and transfer of your personal information for a specific
 purpose, you have the right to withdraw your consent for that specific
 processing at any time. Once we have received notification that you have
 withdrawn your consent, we will no longer process your information for the
 purpose or purposes you originally agreed to, unless we have another
 legitimate basis for doing so in law.

If you want to exercise any of these rights we have developed a webform to make exercising your rights simple and efficient. If you have any further questions about this policy or how we handle your personal information, please get in touch with us by writing to the e-mail address info@psamaras.gr

Please note that requests for data access, erasure, etc. are dealt with via the webform referred to above (click <u>WEBFORM</u>).

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

You also may have the right to make a complaint if you feel your personal information has been mishandled. We encourage you to come to us in the first instance but, to the extent that this right applies to you, you are entitled to complain directly to the relevant supervisory authority (Hellenic Data Protection Authority, http://www.dpa.gr/)

Our Privacy Policy may change from time to time and any changes to the statement will be communicated to you by way of a notice on our website.