# PERSONAL DATA PROTECTION POLICY GENERAL DATA PROTECTION REGULATION (GDPR)

#### Scope of the Personal Data Protection Policy

The company under the name "ELLINIKA TACHYDROMEIA ANONYMI ETAIREIA" and the distinctive title "ELTA", having its registered office in Athens, 1, Apellou Street, P.C. 101 88, (hereinafter referred to as the "Company") with this Personal Data Protection Policy intends to inform data subjects about the manner and purpose of processing their personal data. The Company, as a Data Controller, shall collect and process personal data of data subjects only if absolutely necessary for explicit and legitimate purposes, in accordance with the national and EU legislation on the protection of personal data, in particular with the General Data Protection Regulation (EU) 2016/679 (hereinafter referred to as "GDPR"), the Law. 4624/2019, Law 3471/2006, as amended, as well as the Decisions, Directives and Opinions of the Personal Data Protection Authority (hereinafter referred to as "PDPA").

#### **General Principles of Personal Data Processing**

The Company shall collect and process the personal data of the data subjects in accordance with the following processing principles:

- <u>Legitimacy</u>, <u>objectivity</u>, <u>transparency</u>: The Company shall collect and process this data in a legitimate and transparent manner with regard to the data subjects.
- <u>Limitation of purpose</u>: The Company shall process personal data only for specified, explicit and legitimate purposes.
- <u>Minimisation of data</u>: The Company shall take the appropriate technical and organisational measures to ensure that the personal data processed are appropriate, relevant and limited to what is necessary for the purposes for which they are processed.
- <u>Accuracy:</u> The Company shall ensure that the personal data it maintains and processes shall always be accurate and up-to-date.
- <u>Limitation of the storage period:</u> The Company shall not maintain personal data for a period longer than the purposes for which it was collected and processed. However, the Company may maintain it for a longer period if the processing of such data is necessary:

- a) to comply with a legal obligation requiring processing on the basis of a legal provision,
- b) to perform a task carried out in the public interest,
- c) for reasons of public interest,
- d) for archiving purposes in the public interest, or for scientific or historical research purposes, or for statistical purposes, after appropriate technical and organisational measures have been adopted, including pseudonymisation, and only insofar as these purposes cannot be served by anonymisation of the data;
- (e) to establish, exercise or defend legal claims.
- <u>Integrity and confidentiality:</u> The Company shall ensure that the collection and processing of personal data is carried out in a secure manner, using appropriate technical and organizational means to protect it from any unauthorized or unlawful processing and accidental loss, destruction or damage.

# Personal Data collected and processed by the Company, legal basis and processing purpose

#### 1. Through the Company website www.elta.gr

**1 A.** <u>During user browsing</u> on the <u>www.elta.gr</u> website, certain necessary information related to its traffic may be collected, such as the Internet Protocol (IP) address and the type of browser utilized by the user, etc. through the usage of cookies.

<u>The purpose</u> of the collection and processing of this data is to improve the functionality of the Website and the services provided, to analyse its traffic, etc.

The legal basis for the processing of personal data is the user's consent (GDPR article 6 par. 1a), which is provided by accepting these cookies, with the exception of strictly necessary cookies, which are permanently installed and are absolutely necessary for the operation of the website. For the latter, the legal basis for processing is the legitimate interest of the Company to ensure the smooth operation of the Website (GDPR Article 6 par. 1f). For more information on the use of cookies, please refer to the Company's Cookies Policy.

**1 B.** By filling in the *User Registration* form, the user shall enter the username he/she shall choose, first name, last name, email, password, address, city, country, postal code, telephone number, optionally prefecture, mobile phone and fax and he/she shall select time zone and language. Upon completion of the registration, the user may, by filling in only his/her username and password, gain access (Login) to further services of the Website.

<u>The purpose</u> of the collection and processing of this personal data is to provide the user with access rights to the environment of the www.elta.gr website.

<u>The legal basis</u> for the processing of personal data is the legitimate interest of the Company to improve the services provided to the users of the Website (GDPR Article 6 par. 1f), as well as to fulfil the contractual obligations undertaken by the Company towards the customer (GDPR Article 6 par. 1b).

**1 C.** Through the contact form, the user is provided with the possibility to contact the Company for any requests, questions, clarifications, complaints, etc. If the user wishes to use this service, he/she is required to fill in the relevant fields with his/her name, email address, the Company's service with which he/she wishes to communicate and the content of the relevant message, while optionally he/she may fill in his/her address, telephone number and fax number.

<u>The purpose</u> of the collection and processing of this personal data is to provide the optimal response and service to the user.

<u>The legal basis</u> for the processing of personal data is the legitimate interest of the Company to provide high quality services to its customers and users of the Website (GDPR Article 6 par. 1f).

#### 1 D. Through the e-shop

If the customer has not registered as a user on the Website and wishes to purchase the Company's products through the e-shop, he/she must fill in the relevant form with details such as first name, surname, address, city, country, postal code, telephone number, mobile phone, fax, email, Tax Identification Number, Tax Office, etc.

<u>The purpose of processing</u> this data is to complete the order and send the selected product to the customer-user.

<u>The legal basis</u> for the processing of this data is to fulfil the contractual obligations undertaken by the Company towards the customer (GDPR Article 6 par.1b).

Furthermore, the customer-user may by filling in the relevant fields with his/her username and password, refer to the history of all his orders ("Order History"), through the e-shop of the Website, where all the details of the orders he/she has placed are kept.

<u>The purpose of the processing</u> of this data is to facilitate the customer-user through the display of the history of his/her orders.

<u>The legal basis</u> for the processing of personal data is the legitimate interest of the Company to improve the services provided to customers and users of the Website (GDPR Article 6 par. 1f).

# 1 E. Through web labeling

Through the web labeling application (<a href="https://weblabeling.elta.gr">https://weblabeling.elta.gr</a>) the user of the Website - whether he/she is a visitor or a registered user- may create the accompanying forms (for customs clearance) and the labels for the shipment of items he/she wishes to send to countries outside the European Union. The data collected and further processed are: a) in case of using the application as a visitor, the email of the user-visitor is requested, as well as the sender's details [full name, street and number, city, postal code and optionally district, telephone number, region, parcel box, district number, region explanation and bank account number - iban], b) in case of using the application as a registered user, you are asked to fill in the customer code, user name and password, c) while in each case: the full details of the

recipient [full name, street and number, city, postal code and optionally district, telephone number, region, parcel box, district number, explanation of district and iban], detailed description of the goods (each item contained, quantity, weight, value), the tariff heading number/HS tariff number, as well as the document number (invoice etc.), provided that it is a commercial item.

<u>The purpose of processing</u> this data is to create the accompanying forms for customs clearance and the labels for the shipment of items that the customer-user wishes to send to countries outside the European Union.

<u>The legal basis</u> for the processing of this data is to fulfil contractual obligations undertaken by the Company towards the customer (GDPR Article 6 par.1b).

#### **Liability Disclaimer for Third Party Websites**

#### Social media buttons

On the Company's website <a href="www.elta.gr">www.elta.gr</a> there are social media widgets (e.g. Facebook, YouTube and Instagram) through which, after the user connects to the social network, a special digital footprint is created, for which both ELTA S.A. and the social network itself act as joint data controllers.

For ELTA S.A., the purpose of the processing of this data is to improve the functionality of the Website and the services provided, as well as to analyse the traffic. The legal basis for processing personal data is the legitimate interest of the Company to improve and ensure the services provided to the users of the Website (GDPR Article 6 par. 1f).

ELTA S.A. shall neither control nor be liable for any subsequent processing carried out on it by the joint Data Controllers.

For more information on the data processing policy and the configuration options for these networks, please visit the following websites:

- http://www.facebook.com/about/privacy/
- https://policies.google.com/privacy?hl=el&fg=1
- https://help.instagram.com/519522125107875
- https://policies.google.com/privacy

## **Redirection to Partner/Third Party websites**

On the Company's website <u>www.elta.gr</u> there are links, which redirect users to the websites of Partners/Third Parties, such as when carrying out a monetary transaction. The Company shall neither control, nor be liable for the content of these websites, nor for the way in which personal data is processed. Especially for credit/debit card payments:

ELTA. S.A. shall not keep in any case a record of the debit/credit card details of the customer-user. Before authorizing any transaction, the customer-user is directly connected through hyperlink to another website using an online technology under the responsibility of the relevant banking institution or an authorised electronic money institution. This means that the website <a href="www.elta.gr">www.elta.gr</a> shall not use, for any reason, any credit/debit card details you have entered, as these are not visible to the ELTA. Please note that the Company cannot

guarantee the security of data, information, etc. received via e-mail. Consequently, customers-users should NOT send any information and payment details by e-mail.

#### 2. In the context of the services provided by the Company

#### 2.1 Correspondence and Packages (senders and recipients)

The Company, in the context of its activities, shall collect and process the following data about its customers (senders and recipients): first name, surname, father's name, residence address, city, country, postal code, telephone number (landline/mobile), occupation, work address, city of work, work postal code, email (company/personal), customer code, unique customer number/key number, Tax Identification Number, Identification Card Number, customs classification, customs data, data that compile the transaction profile of each customer.

<u>The purpose of processing</u> this data is to provide customer service, to complete the dispatch of documents and items and to invoice the services provided.

<u>The legal basis</u> for the processing of this data is to fulfil the contractual obligations undertaken by the Company towards the customer (GDPR Article 6 par.1b).

#### 2.2. Financial products

The Company, in the context of its activities, shall also act as a Payment Service Provider and shall process personal data collected either upon submission of an application/receipt of an offer to supply a product or service, or at a later stage, including those that shall arise from the conclusion and operation of a contract(s) with the Company, or in the context of general relationships, partnerships and transactions.

The Company shall collect and further process: a) identification data, such as: full name, father's name, mother's name, identity card or passport, Tax Identification Number, Tax Office, Social Security Number, date and place of birth, gender, nationality, signature data, etc., b) contact details, such as: postal address, e-mail address, landline and mobile telephone number, fax, email, etc., c) data resulting from documents and supporting documents presented or sent to the Company, either during the contractual relationship or transaction or cooperation, or during the pre-contractual stage; d) financial and property status data, such as: occupation, marital status, income statements, insurance and/or tax clearance certificates, etc.; e) data on the execution of payment transactions from or to you within the framework of the applicable legislation on the provision of payment services; as well as f) data from the implementation of the contract (including the execution and handling of orders) with the Company, the execution of transactions, as well as the use of products or services provided. It is noted that the type and amount of other necessary personal data collected and processed shall depend in each case on the status of the data subject, as well as on other factors, such as the type of transaction/contract/relationship, the product/service provided and their provision shall constitute a necessary condition for the initiation or continuation of the transaction/contract/relationship with the Company and the provision of the product or service.

<u>The purpose of processing</u> the above data is to serve the consumer, to execute and to smoothly operate the contractual relationship, as well as for the Company to comply with the obligations imposed by the applicable legal, regulatory and supervisory framework.

<u>The legal basis</u> for the processing of this data is to fulfil the contractual obligations undertaken by the Company towards the customer (GDPR Article 6 par. 1b) and to comply with the legal obligation of the Company (GDPR Article 6 par. 1c).

#### 2.3. Computerised processing for Road Traffic Code (RTC) offences

The Company shall carry out computerised processing of vehicle calls for the photocopying of the payment documents and then shall undertake the reimbursement of the amounts to the local authorities and their updating. In this case, personal data of citizens are collected, such as first name, surname, ticket number, IBAN, amount of deposit withdrawal, etc.

<u>The purpose of the processing</u> of this data is to arrange the payment of the ticket by its bearer (Road Traffic Code offender).

<u>The legal basis</u> for the processing of this data is to execute the contract concluded between the Company and the respective local authority (GDPR Article 6 par. 1b).

#### 2.4. Electricity

The Company as an Electricity Provider, in the exercise of its activities and in particular in the provision of the "ELTA Energy" services, it shall collect and process personal data of customers and potential customers, namely: a) identity and contact details, such as full name, Tax Identification Number, Tax Office, address, telephone number, mobile phone number, fax number, e-mail address, b) financial data, such as proof of legal use of the installation (e.g. lease, title deeds, Property Return (E9), bank accounts and card numbers, details of transactions and payments performed under a contractual relationship with the Company, copies of connection contracts with the respective managers, certificate of commencement of business activities at the Tax Office (in the case of a supply contract for professional use), (c) social welfare/status data as data relating to a special customer category (e.g. customer in a vulnerable group or beneficiary of a social home tariff), such as multiple parenthood, disability rate.

The purpose of processing this data is services and customer service, the billing of the services provided, to issue and to pay the bill.

<u>The legal basis</u> for the processing of this data is to fulfil the contractual obligations undertaken by the Company towards the customer (GDPR Article 6 par. 1b) and to comply with a legal obligation of the Company (GDPR Article 6 par. 1c).

#### 3. Through the Company's website https://eltaenergeia.gr/

**3 A.** <u>When users browse</u> the <u>https://eltaenergeia.gr/</u> website, certain necessary information related to its traffic, such as the Internet Protocol (IP) address and the type of browser utilized by the user, etc. may be collected through the usage of cookies.

<u>The purpose</u> of the collection and processing of this data is to improve the functionality of the Website and the services provided, the analysis of its traffic, etc.

<u>The legal basis</u> for the processing of personal data is the user's consent (GDPR Article 6 par. 1a), which is provided by accepting these cookies, with the exception of the strictly necessary cookies, which are permanently installed and are absolutely necessary for the

operation of the website. For the latter, the legal basis for processing is the legitimate interest of the Company to ensure the smooth operation of the Website (GDPR Article 6 par. 1f). For more information on the use of cookies see the Company's **Cookies** policy.

**3 B.** Through the contact form "Ask us to call you" the user shall enable the Company to contact him/her by telephone for any requests, questions, clarifications, complaints, etc. In case the user wishes to use this service, he/she should fill in his/her full name and telephone number in the relevant fields.

<u>The purpose</u> of the collection and processing of this personal data is to provide the optimal response and service to the user.

<u>The legal basis</u> for maintaining personal data is the legitimate interest of the Company to provide high quality services to its customers and users of the Website <a href="https://eltaenergeia.gr/">https://eltaenergeia.gr/</a> (GDPR Article 6 par. 1f).

**3 C.** By submitting an online application In case the user wishes to apply for the supply of electricity through the Website <a href="https://eltaenergeia.gr/">https://eltaenergeia.gr/</a>, he/she shall complete and the Company shall collect: a) personal data (customer data), that is, full name, father's name, Tax Identification Number, Tax Office, address, postal code, Regional Unit (Prefecture), city, country, mobile telephone, landline telephone (optional), b) contact details, namely, address, postal code, city and email, in case the customer wishes to receive the electricity bill by e-mail; c) supply details, that is, supply number, supply address, number and last meter indication.

The purpose of processing this data is to complete the order and send the selected product to the customer-user.

<u>The legal basis</u> for the processing of this data is to fulfil the contractual obligations undertaken by the Company towards the customer (GDPR Article 6 par. 1b).

#### **Liability Disclaimer for Third Party Websites**

In case the <a href="https://eltaenergeia.gr/">https://eltaenergeia.gr/</a> website contains links that redirect users to third party websites, we inform you that the Company shall neither control nor is it liable for the content of these websites, nor for the way in which the personal data of users are processed.

#### 4. Through the Company's "ELTA MyStamp" application

When creating an account ("Log in") the user, if he/she wishes to register, he/she shall enter and the Company shall collect and further process: a) identification and contact details, namely, full name, email, password, address, postal code, city, telephone number, b) photos, c) data necessary for the provision of the service, such as access to the location of the device (GPS), access to the camera of the user's device for the operation of the application, type of connection via Satellite or Broadband Connection, type and operating device ios or android.

<u>The purpose of the processing</u> is to provide the service through which the user can create and purchase stamps, which shall bear an image (photo) that he/she shall choose.

<u>The legal basis</u> for the processing of such data is to fulfil the contractual obligations undertaken by the Company towards the user-customer (GDPR Article 6 par. 1b).

#### **Processing of Personal Data for other purposes**

If the user provides his/her consent, informative messages on issues relating to the application and its functions, new applications or additional features of the application that are released or promotional material for other services, products or programmes provided by the ELTA Group shall be sent to his/her e-mail address connected to the application.

In case the user provides his/her consent, the Company may process his/her data through the service in order to create a user profile with the purpose of providing offers and products based on the user's personal needs and preferences.

The user's consent for the above data processing may be withdrawn or modified for the future at any time, by sending an electronic message to <a href="mailto:dpo@elta-net.gr">dpo@elta-net.gr</a> or by calling at the telephone number 2103353535.

More detailed information is available at <a href="https://mystamp.elta-net.gr/privacy\_el.html">https://mystamp.elta-net.gr/privacy\_el.html</a> .

#### 5. Through the Company's video surveillance systems (CCTV)

The Company shall collect, process and store image data through the video surveillance systems (CCTV) that it has installed.

<u>The purpose</u> of processing this data is to ensure the safety of persons (e.g. employees, customers, etc.) and goods on its premises in compliance with the specifications and deadlines provided for by the existing legislation.

<u>The legal basis</u> for the processing is the legitimate interest of the Company (GDPR Article 6 par. 1f).

More detailed information is available in the posted "Information on the processing of personal data through a video surveillance system".

#### 6. Through the Company's audio recording systems

In certain cases, and upon prior notification of the subjects, the Company may record the telephone calls of customers in order to provide a better service to them, always in accordance with the requirements of the existing legislation on for keeping audio data.

<u>The purpose</u> of processing this data is to guarantee the security of communication and to provide better service to the Company's customers.

<u>The legal basis</u> for processing is the legitimate interest of the Company (GDPR Article 6 par. 1f).

#### 7. Company Employee Data

The Company shall collect and process personal data related to the employment relationship, as defined in the relevant collective or individual employment contract. Indicatively, this data may include first name, last name, father's name, mother's name, gender, date of birth, residence address, telephone number (landline/mobile), email (business/personal), marital status, number of children, marriage and civil partnership

certificates, details of identity card number, Tax Identification Number, Tax Office, IBAN, educational qualifications, language certificates, certificates of military service, training courses, degrees, previous service, seniority, date of recruitment, Code Register number (KAM), job responsibilities, disciplinary record, signatures, employee evaluations, Inspectors' survey findings, payroll data, benefits, etc. Detailed information on how employees' personal data is collected and processed is contained in the form "Employee Information on Personal Data Protection", which has been distributed to all employees of the Company.

<u>The purpose</u> of processing such data is the management of the employment relationship and the fulfilment of the Company's employment obligations.

<u>The legal basis</u> for processing the data is to implement the employment contract (GDPR Article 6 par. 1 b) and the Company to comply with its legal obligations under labour and social security law (GDPR Article 6 par. 1c).

#### **Candidate Employees**

Furthermore, the Company shall collect and further process data on employee candidates for job vacancies. In this case, the Company shall commit to collect and process only the data that is deemed absolutely necessary for the assessment of the suitability of each candidate for the specific position (e.g. first name, last name, contact details, education, work experience, etc.).

<u>The purpose</u> of processing this data is to assess the suitability of the candidate for a specific position, as well as the possible use of this data for any future vacancies.

<u>The legal basis</u> for the processing of this data is the legitimate interest of the Company (GDPR Article 6 par. 1f).

#### 8. <u>Data on the Company's Suppliers and Partners</u>

The collected data are the following: first name, last name, father's name, gender, date of birth, telephone number, home address, telephone number (landline/mobile), email (business/personal), Identity Card Number, Tax Identification Number, Tax Office, IBAN, educational qualifications, language certificates, data concerning criminal convictions and offences, as well as any further data that may be required by the national legislation (e.g. tax legislation).

<u>The purpose of processing</u> this data is to select appropriate Suppliers/Collaborators, or to conclude assignment contracts and to monitor their implementation, etc.

<u>The legal basis</u> for the processing of this data is to implement the contract concluded with the Company's Suppliers/Collaborators (GDPR Article 6 par. 1b) and for the Company to comply with its legal obligations (GDPR Article 6 par. 1c).

#### **Collection and processing of Sensitive Personal Data**

In certain cases, the Company may collect and process sensitive personal data (special categories of personal data) in order to meet its legal obligations. More specifically, the Company may process health data of its employees, such as, for example, medical certificates and opinions concerning the health status of the employees, or the children or

spouse of the employees, disability certificates, opinions of the competent Personnel Health Committee, sickness/child-rearing permits, social security numbers, data concerning the insurance coverage of employees, etc., data referring to criminal convictions and offences, interrogation material, etc.

<u>The purpose</u> of processing this sensitive data is to update the medical history of employees in order to protect them from any risks/ vulnerabilities/ health problems.

The legal basis for the processing of this data is to fulfil the Company's obligations and to exercise specific rights of the Company or the employee in the field of labour law and social security and social protection law and there is no reason to consider that the legitimate interest of the data subject in relation to the processing shall prevail (GDPR Article 9 par. 2b, Law 4624/2019 Article 27 par. 3a). Alternatively, a legal basis for the processing of the sensitive personal data of the Company's employees may be the prior free and express consent of the employees (Law 4624/2019 Article 27 par. 3b).

#### **Collection and processing of Personal Data of Minors**

In principle, the Company shall not directly or indirectly collect and process personal data of minors (namely persons who have not reached the age of 18). However, since it is impossible to cross-check and verify the age of our customers, we kindly ask the parents/guardians of the minors, in case they detect any unauthorized disclosure of data on behalf of minors, to notify the Company immediately and take the necessary protective measures (e.g. deletion of their data). In case the Company becomes aware that it has collected personal data of a minor, it commits to delete it promptly and to take all necessary measures to protect such data.

## **Transfer to third parties**

The Company may transfer the above personal data to third parties to whom it has entrusted the processing of personal data on its behalf (such as service providers, etc.). In any case, the third parties, to which the data of the subjects may be transferred, are contractually bound to our Company to ensure the confidentiality obligation, as well as all the obligations provided for by the national and EU legislation on the protection of personal data.

At the same time, personal data of the data subjects may be transferred to public authorities, independent authorities, regulatory and supervisory authorities, etc. (e.g. Police Departments, Prosecution, Judicial, Tax, Customs authorities, the Hellenic Data Protection Authority, the Hellenic Telecommunications & Post Commission, the Regulatory Authority for Energy, etc.).

#### Transfer of Personal Data outside the EEA

In case of transfer of personal data of the data subjects to a country outside the European Economic Area (EEA), the Company shall first check whether:

- (a) the Commission has adopted an adequacy decision for the third country to which the transfer is to be made.
- (b) appropriate safeguards are in place in accordance with the Regulation for the transfer of this data. In particular, the Company attempts to sign a **Data Transfer Agreement** with the third country, which includes standard contractual data protection clauses.

Otherwise, the transfer to a third country is prohibited and the Company shall not transfer personal data of the data subjects to that country, unless one of the specific exceptions provided for by the GDPR shall apply (e.g. the express consent of the user and informing him/her on the risks involved in the transfer, the transfer is necessary for the performance of a contract at the request of the data subject, there are reasons of public interest, it is necessary to support legal claims and vital interests of the data subject, etc.).

The Company has acceded to the international multilateral agreement entitled "Agreement for the Electronic Exchange of Postal Service Data" (DSA 2), which shall define the conditions and method of transmission of data to be transmitted in electronic form (ITMATT) to Postal Services of third countries, shall serve custom purposes and help to reduce the time required for the customs procedures.

# **Time Period for Maintaining Data**

The personal data of the subjects is collected and kept for a predetermined and limited period of time, depending on the purpose of the processing, after which the data is deleted from our records. Where the processing is required as an obligation by provisions of the applicable legal framework or a specific retention period is foreseen, your personal data shall be stored for as long as the relevant provisions require. The personal data of the subjects collected and processed to execute a contract shall be kept for as long as necessary for implementing the contract and to establish, exercise, and/or support legal claims based on the contract. The personal data of the subjects that shall be processed for marketing purposes with the consent of the subjects (e.g. data from the subscription to the Newsletter) shall be kept until the consent is withdrawn, without prejudice to the legitimacy of the processing carried out until then.

#### **Personal Data Breach**

In the event of a breach incident, the Company shall apply a specific **Policy for the Management of Personal Data Breach Incidents**. If you become aware or suspect that a personal data breach may/has taken place, please notify the Company without delay either by sending an email at <a href="mailto:dpo@elta-net.gr">dpo@elta-net.gr</a> or by calling at 210-3353535.

# **Protection and Security of Personal Data**

Taking into account the latest developments, the implementation costs and the nature, scope, context and purposes of the processing, as well as the risks of varying likelihood and severity for the rights and freedoms of the data subjects from the processing, the Company shall take the necessary technical and organizational measures to protect the personal data of the Subjects, as described in the "Information Security Policy" and in the "Postal Services Privacy Policy" it has adopted. Although no method of transmission over the Internet or method of electronic storage is completely secure, the Company shall take all the necessary digital data security measures (antivirus, firewall), etc. At the same time, the Company shall take the required physical security measures such as the installation of a video surveillance system (CCTV), alarm system, etc.

# **Rights of Data Subjects**

Our Company shall ensure that it is able to respond promptly to the requests of data subjects to exercise their rights in accordance with the national and EU legislation on the protection of personal data. In particular, each data subject has the following rights:

- a) To request an update on the processing of his/her personal data by the Company.
- b) To request access to his/her personal data held by the Company. More specifically, he/she may request to receive a copy of his/her personal data held and to verify the legitimacy of the processing.
- c) To request the correction of his/her personal data in case of incorrect or incomplete registration by the Company.
- d) To request the deletion of his/her personal data if their retention is not based on any legal basis or legitimate interest.
- e) To request restriction of the processing of his/her personal data.
- f) To request the portability/transfer of his/her personal data either to himself/herself or to third parties.
- g) To revoke at any time the consent given for the processing of his/her personal data, without this revocation affecting the legitimacy of the processing until then.
- h) To object to the processing of his/her personal data by the Company.
- i) To object to a decision concerning him/her that is taken solely on the basis of automated processing, including profiling.

If any of the above rights are exercised, the Company shall respond promptly (in any case within thirty (30) days from the submission of the request), informing you in writing about the progress of the request.

In case of any complaint regarding this policy or any personal data protection issues, should we fail to satisfy your request, you may contact the Hellenic Data Protection Authority via the following link: <a href="https://www.dpa.gr">www.dpa.gr</a>.

# **Data Protection Officer (DPO) details**

To exercise all the above rights, as well as for any issue regarding the processing of your personal data by the Company, you can contact the Company's Data Protection Officer, at the email: <a href="mailto:dpo@elta-net.gr">dpo@elta-net.gr</a>, or at the telephone number 210-3353535.

# **Updates to the Personal Data Protection Policy**

This Personal Data Protection Policy may be amended/revised in the future, in the context of the Company's regulatory compliance, as well as the optimisation and upgrading of the Company's services. We therefore recommend that you refer to the updated version of this Policy each time, for your adequate information.

**Latest Revision: December 2021**