# **DATA PROTECTION POLICY**

for Economic operators, providers of goods and services, collaborators, external consultants, recruitment candidates and third parties

www.exergia.gr

\_\_\_\_\_

The Company Exergia S.A. (hereinafter referred to as the "Company" or "we") tries to offer you an experience that meets the needs of our economic operators, providers of goods and services, collaborators, external consultants, recruitment candidates and third parties, by using responsibly the information collected at the time the relevant activity takes place. We are committed to respect your privacy and complying with applicable laws on data protection and data privacy.

Processing of your personal data is governed by this Policy, by the relevant provisions of both Greek and EU legal framework on data protection, including the General Data Protection Regulation (2016/679), the Greek Law 4624/2019 and the relevant decisions, guidelines and regulations issued by the competent Hellenic Data Protection Authority.

This Privacy Policy (the "Policy") forms an integral part and is incorporated into the Terms of Use of our Website and may be subject to modifications. We advise you to regularly check our Data Protection Policy in order to remain informed and updated on any amendments. When substantial amendments are made, we will ensure that a relevant notice is posted for visitors of our Website.

This Policy explains how we collect, process and/or use the information that we receive via our Website or email. This Policy also describes how we collect, process, use and share the personal information you provide us with. It also describes your choices regarding the use, access, transfer, correction and deletion of your personal information.

#### 1. Information we collect

We collect information about you to provide our services. In order for us to best provide our services to you and our economic operators, providers of goods and services, collaborators, external consultants, recruitment candidates and third parties and to fulfill the relationship we have with you, it is essential that we are able to collect and use the information as described in this Policy.

#### 1.1 Information you provide to us

When you submit your data, we collect and maintain your data exclusively for the purposes mentioned below. In this context, we collect the data you submit, such as your first name, last name, email address and also all other personal data.

# 1.2 Information We Collect Automatically

When you use the Website, your device automatically providing information to us, so we can respond and customize our response to you. The type of information we collect by automated means generally includes technical information about your computer, such as your IP address or other device identifier, the type of device you use and the operating system version. The information we collect may also include usage information and statistics about your interaction with the Website. That information may include the URLs of our web page that you visited, URLs of referring and exiting pages, page views, time spent on a page, number of clicks, platform type, location data (if you have enabled access to your location on your mobile device) and any other information about how you used the Website.

This information is collected by using Cookies & other similar Tracking Technologies. We strongly advise you to review our Cookies Policy in order to learn more about Cookies, how we use them and how you can control the use of Cookies.

### 1.3 How we collect your personal data

We use different ways to collect your personal data:

- **Direct interactions.** You may provide us with your identity, contact information, email, phone by email or through the website.
- Automated technologies or website interactions. As you interact with the
  Website, we may automatically collect technical information about your device
  etc. We collect this information through cookies, server logs and other similar
  technologies.
- Third parties or public sources. We may collect your information from third parties, for example from search engines such as Google.

# 2. Why we collect your information

We process your data exclusively for the purposes explained in the following Table.

Purpose	Explanation
<ul> <li>Fulfilment of pre-contractual, contractual obligations and tax obligations arising from the relationship with EXERGIA:</li> <li>execution and conclusion of the contract;</li> <li>payment of fees for services rendered in favor of EXERGIA in any capacity (e.g. competition or tender commissioners, external consultants/collaborators missions, etc.).</li> </ul>	In the context of the company's project activities, including, among others, organization and execution of convention events and questionnaire campaigns, we will maintain the personal data of participants, subcontractors, external experts who are linked with the EXERGIA project activity.
Collection of satisfaction questionnaires	In the context of the company's management system as well as of project activities, satisfaction questionnaires are requested from clients' staff. We will maintain the personal data of relevant campaign participants.
Job recruitment	If you provide your consent by applying for an open job vacancy or unsolicited, we will maintain the submitted documents (i.e. C.V., cover letter, reference letters, certifications and any other personal information) for current or future recruitment purposes.
Improvement of services	We maintain your data and the history of usage of our services in order to produce statistics that allow us to better assess the visits and navigation of users through our Website in order to improve its content and structure.

# 3. Recipients of your data

Access to your data may only be provided to our duly authorised employees or business partners who act on our behalf for the above purposes of processing, by offering us IT services for the registration and storage of your data and for the operation of our Website. The Company can disclose personal data to other public authorities when they need to process these data in order to carry out procedures for which they are the responsible institutions. On specific grounds, the Company can also disclose personal data to other public bodies if the disclosure is provided for by the European Union legislative framework or Member State Law or for purposes of defense, security or investigation of offences.

# 4. Transfer of personal data

Your personal data will not be transferred to non-EU countries (Third Countries) except in cases where this is guaranteed by decisions of the European Commission or carried out in such a way as to provide appropriate and adequate safeguards pursuant to Articles 46, 47 or 49 of the GDPR.

### 5. Duration of processing

Retention period can vary significantly based on the type of information. Our retention period is based on criteria that include legally mandated retention periods, pending or potential litigation, our intellectual property or ownership rights, contract requirements, operational directives or needs and archiving. In any case, you may request that we delete your data at any time.

### 6. Your rights

The Company ensures your rights with respect to the processing of personal data. You have the following rights:

- Right of Access: You have the right to access your personal data and receive additional information about how we process it.
- Right to rectification: You have the right to rectify your personal data if it is inaccurate or incomplete.
- Right to erasure (Right to be forgotten): You have the right to request deletion of
  your personal data, unless its processing is necessary for the exercise of legal rights
  of the Company or third parties, for the fulfillment of a legal obligation, for public
  interest reasons or for defending our legal rights before any judicial or other
  authorities.
- Right to restriction of processing: You have the right to request a restriction of processing of your personal data, in the following cases: (1) when the accuracy of the personal data is contested and until the accuracy is verified (2) when you oppose the deletion of your personal data and request the restriction of their use instead, (3) when personal data are not needed for processing purposes, they are however required for the establishment, exercise, or defense of legal claims, and (d) when you object to the processing and the decision on your objection to processing is pending.
- Right to withdraw personal data: You may at any time withdraw your consent to the processing of your personal data, following the instructions included in the Terms for submitting your CV or by sending an email to <a href="mailto:dpo@exergia.gr">dpo@exergia.gr</a>. In such a case, any personal data processing will be suspended, nevertheless this will not impact the legitimacy of any processing performed until the time of withdrawal.
- Right to object to processing: You have the right to object at any time to the
  processing of your personal data where, as described above, the processing is
  based on the legitimate interests we pursue as data Controllers, as well as, for the

purposes of direct marketing and consumer profiling, if applicable.

Right to data portability: You have the right to receive your personal data free of
charge in a format that allows you to access, use, and edit them with commonly
used editing methods. You also have the right to ask us, in case it is technically
feasible, to transmit the data directly to another Controller. Your right to do so
exists for the data you have provided to us based on your consent or for the
execution of a relevant contract.

If you believe that your data protection rights have been violated, you have the right to lodge a complaint with the Hellenic Data Protection Authority (www.dpa.gr)

Tel: +30 210 6475600, Fax: +30 210 6475628, e-mail: contact@dpa.gr.

#### 7. CONTACT INFORMATION

EXERGIA S.A. 15, Voukourestiou Str., Athens 106 71

dpo@exergia.gr