

1. Who is responsible for your personal data?

Responsible for Processing your personal Data is the Company under the name "ERGOCERT HELLAS AUDITS - INSPECTIONS – CERTIFICATIONS S.A.» with the distinctive title «**ERGOCERT HELLAS S.A.**» (hereinafter referred to as «the Company»), based in 2 Kefallinias Street, Thessaloniki, Greece (call center: +30 2310 552167 and contact e-mail: info@ergocert.gr).

2. General principles followed by the Company regarding transparent information

2.1. All information provided in the present document, as well as any kind of information you may request from us in the future, is provided free of charge, provided that the request is not repeated, exaggerated or manifestly unjustified (more info in paragraph 2.3).

2.2. For each of the above rights, the Company will respond to you within one (1) month from the receipt of the request or in case of objective difficulty, complexity of the request or the number of the requests, the Company will respond within a maximum period of three (3) months in total, either by completing the request or by a justified refusal to perform what you have requested for, for legitimate reasons that are explicitly specified in General Regulation 2016/679.

2.3. If the Company judges that any of the above rights are being exercised manifestly unfounded or the request is excessive or (to a greater extent) has a repetitive nature, it may impose a reasonable fee is entitled on the one hand to charge you with a reasonable fee in order to provide further information (which in principle is free of charge) and, on the other hand, to refuse to respond to the request.

2.4. In case that the Company has reasonable doubts about your identity when you submit a request for exercising any of your above rights, you may be requested to provide additional information necessary to confirm your identity before the processing of your request.

2.5. In the event that the Company delays beyond the justified period of time to respond to your request, and in any case where you believe that your rights are violated or the Company is not consistent with its obligations to keep your data secure, you have the right to submit a complaint to the competent supervisory authority, (Hellenic Data Protection Authority, "DPA", Athens Kifissia 1-3, P.K. 115 23, Athens, contact@dpa.gr, T:+30-210 6475600)

2.6. You reserve the right to withdraw your given consent at any time, by submitting a relevant written request, as well as the right to address your requests for the use of your rights mentioned below to the following email address: gdpr@ergocert.gr.

3. Which are your rights in relation to the Personal Data you provided us with?

3.1. Right to be informed

You reserve the right to request information in relation to the personal data which we have received from you and maintain for one or more purposes, as described below under clauses A to C. The present document is a manual of basic awareness and understanding of the philosophy of the regulatory framework that runs through the protection of your personal data. Update, further explanation, and clarifications as for this text can be provided to you, following your request for the exercise of your right to be informed.

3.2. Right to access

You reserve the right to request access to your information and to be informed about the processing of your personal data as well as to which extent this processing takes place.

In particular, you have the right to be informed about:

- The purpose of the processing
- The data being processed
- The recipients of the data, especially when the data are to be transferred to third countries, and the guarantees given during that transfer
- The data retention period
- Any available information about the origin of the data, in the case that the data has not been obtained by you
- The case where your data is used for profiling

Based on the above you have the right to receive a copy of your data.

3.3. Right to Rectification

You reserve the right to request rectification of your data, in case where the data that we have the right to process has been altered or incorrectly submitted.

3.4. Right to Deletion

You reserve the right to request full or partial deletion of your personal data that we are entitled to store and process, either because they are no longer necessary for the purposes for which they were collected, or because you withdraw your consent, or because your data were collected for a purpose that you consider as illegal. The Company, within a reasonable period of time (no more than one month, and if there is an objective difficulty, no more than three months in total) shall reply to you by confirming the complete or partial deletion of your data or the inability to delete part of the data, according to the following reasons: if any law or the performance of a task carried out in the public interest, or the right of freedom of expression and information, or the exercise or defense of any legal claim requires the maintenance of the above mentioned data. In such a case, you have the right to submit a complaint to the Hellenic Data Protection Authority, and the right to an effective judicial remedy.

3.5. Right to Restriction

You reserve the right to request to restrict the processing of your data, in terms of quantity, time or in relation to the purpose of their processing, and more specifically (a) either because you doubt the accuracy of your data and for as long as the Company needs to verify its accuracy, (b) either because you consider the processing to be illegal, and instead of the deletion of the data you opt for its restriction, (c) either because the data use is no longer needed, however, you don't wish its deletion since their maintenance shall serve for some juridical claim, (d) or, in case where you have objections to the processing of the data and until it is verified that your rights as a data subject are overriding the Company's legitimate grounds for processing.

3.6. Right to Portability

You reserve the right to receive the personal data you have provided us with, in a structured, commonly used and machine-readable format, as well as the right to transfer them without objection, given that the processing is being carried out on the grounds of your consent. In the context of the exercise of this right, you may also request direct transfer from the Company to the third entity without your own intervention.

The present right is exercised, subject to the conditions of deletion, as described above (under 3.4) and its exercise shall not adversely affect the rights and freedoms of others.

3.7. Right to Objection

3.7.1. You reserve the right to object to the use of your personal data for the purpose of direct marketing purposes and specially to profiling related to this direct marketing.

3.7.2. There is no such right in the case of Prospective Employees, as this data are not transferred to the Marketing department, and they do not undergo such treatment.

3.8. Rights to Exercise

The exercise of all your above legal rights is carried out by completing the "special subject request form" provided by the Company as part of the relevant procedure for managing your requests.

4. Is there any possibility that your personal data being transferred somewhere else?

There is no provision that your data be transferred to any organization outside the Company, with the exception of (a) the service providers for our Company's electronic systems and networks – and for the exclusive purpose of supporting our Company and (b) the competent tax authorities within the framework of the Company's mandatory compliance with the tax legislation and to the extent that it is necessary.

5. Safeguards

We assure you that the Company will use any technical and organizational data protection means and will use and process your data at the optimum, minimum and absolutely necessary level, as defined by the law, and strictly and exclusively for the purpose for which you have provided them to us.

Specific provisions regarding the individual categories of Personal Data Subjects, that are implemented cumulatively with the above general provisions of the Policy.

(A) RECIPIENTS OF COMMUNICATION

A.1 Purpose: The receipt, processing and maintenance of your data, provided exclusively in the framework of communication, is executed for the sole purpose of your briefing about the Company's products, actions and news including the possible sending of souvenirs, corporate calendars and/or greeting cards.

A.2 Legitimate Basis of the Processing: Your consent to the processing of your data, in order to fulfil the above-mentioned relevant purposes, constitutes the Legitimate Basis of this Processing, in accordance with Article 6 par.1(a) of the Regulation on the protection of personal data.

A.3 Data Retention Period: In order to fulfil the above mentioned purpose of processing, that is your briefing about our products and actions, we consider it reasonable and necessary to maintain your relevant data for a period of ten (10) years. After ten years from the time you provided your consent, the relevant data will be deleted, unless you provide us with a new consent under the above conditions.

(B) CUSTOMERS – SUPPLIERS and POTENTIAL CUSTOMERS – SUPPLIERS

B.1 Nature – Legitimate Basis:

(a) During the pre-contractual phase and specially in case of filling in an electronic contact form on our website, or direct sending an e-mail, or communication by telephone, or filling in a hardcopy document (in all those cases you provide us with your full name/e-mail address or/and telephone number or/and Address or/and profession or/and services that you are interested in), purpose of the processing is the evaluation of a possible transaction with the Company and the Legitimate Basis is the service of the Company's legitimate interest to pursue its commercial purposes, responding to the requested communication to investigate the possible transaction with you.

(b) In case of a transaction with the Company, the data that you have provided us with during the pre-contractual phase (as well as all that you shall provide us with in the framework of our transaction – including the personal data of legal representatives and of legal entities) shall be processed for the purpose of implementing the contract between us and of our compliance with tax legislation. In this case, Legitimate Basis of the Processing is the performance of the contract between us and our compliance with the legislation (Article 6 par. 1(b) and 1(c) of the Regulation on the protection of personal data).

Especially about the personal data of your add-ons and/or (in the case of a legal entity) legal representatives, the Legitimate Basis of Processing the specific data is to serve the legitimate interest of the Company to adequately fulfill its contractual obligations as stated above.

B.2 Data Retention Period:

We will keep the above under B.1.(a) data for ten (10) years and afterwards we will delete them. The above under B.1.(b) data, will be reserved for as long as it is necessary according to tax legislation.

B.3 It is noted that especially regarding Partners who provide services to the Company and/or have contracted with it, the Company may also keep evaluation files of their cooperation apart from the above data under B.1. The purpose of the processing of the particular file is the optimization of the Company's collaborations in the context of the pursuit of its statutory purposes and the Legitimate Basis of Processing, according to art. 6 par. 1(f) of the Regulation, is to serve its legitimate interests which consist in the above optimization and evaluation of its collaborations.

(Γ) PROSPECTIVE EMPLOYEES:

C.1 Purpose: The evaluation of the possibility of being employed by the Company.

C.2 Legitimate Basis of the Processing: For the data you have provided to us in the context of the evaluation of the possibility to be employed by our Company, the Legitimate Basis is your consent according to Art. 6 par.1(a) of the Regulation.

C.3 Data Retention Period: In order to fulfill the processing purpose related to the investigation of the occupation of a certain job position, we consider a reasonable and necessary period of retention of your relevant data to be twenty-four (24) months. After the lapse of twenty-four (24) months from the time your CV was received, the relevant file with all your personal data will be deleted.
