

## **1. The Company as "Controller" and "Processor" of Personal Data**

The Company was founded in 2007, it operates in the form of societe anonyme and is governed by the provisions of Laws 2190/1920, 4548/2018 and its founding law. As a societe anonyme it is registered at General Commercial Registry (GEMI) of the Athens Chamber of Commerce and Industry with number 7359701000 and it has its registered office at 29 K. Varnali St., Chalandri, 15233, Athens. It is managed by a Board of Directors comprising of three (3) members.

The COMPANY processes, in the course of its activity, the personal data of the parties trading with it, becoming as regards such data the "controller" or "processor".

In carrying out its business, the Company processes (simple and special category) personal data of the subjects participating in the Programs for the purposes of implementation, evaluation and control and the relevant legal obligation for the processing of personal data in the form of individual participants' data (microdata) derives mainly from both the General Regulation and the European Social Fund Regulation as well as from specific provisions of the Greek legislation.

The data processing concerned is governed by the provisions of Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation).

## **2. Data sources**

The COMPANY collects your personal data from various sources. Particularly:

- 1) Personal data you directly provide to it;
- 2) Personal data that it collects automatically, such as through cookies ([see cookies policy](#)). The following may be collected:
  - Your IP address;
  - Your cookie ID;
  - Your browser;
  - Your location;
  - The web pages you visit on our website (www.convin.gr);

as well as

- 3) Personal data collected from other sources, i.e. from other public authorities as well as from publicly accessible sources.
- 4) Personal data collected from its contacts with companies / sponsors of its Programs

### 3. Categories of data

The data we process, as the case may be, are:

- Simple Data, such as mainly first and last name, date of birth, ID number, TIN, address, telephone, e-mail, etc.
- Special Category data, such as data on religion, nutritional allergies, possible health problems and data on ethnic origin.

### 4. Purpose of Processing

The reasons the COMPANY processes your data, as the case may be, are:

- to communicate with you;
- to answer your questions;
- to process your requests;
- to evaluate your resume;
- to conclude contracts with you;
- to execute its contractual obligations towards you;
- to declare your participation in events / activities;
- to fulfil its legal obligations under the domestic and EU law;
- to organize its activity in the field of electronic communications and finally,
- through the closed circuit television systems (CCTV) to protect the safety of its facilities as well as of its employees and all other third parties legally entering into them, from the invasion of bystanders and from any perchance criminal action against its assets and those who lawfully use its facilities.

### 5. Legal bases of processing

In particular, as the case may be, the legal bases on which we support the processing of your data are the following:

- **Article 6, par. 1a of GDPR**

When you have given consent to the processing of your data for one or more specific purposes.

- **Article 6, par. 1b of GDPR**

Processing necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract

- **Article 6, par. 1c of GDPR**

Processing necessary for our compliance with our legal obligation as this derives from the EU or the National Law

- **Article 6, par. 1e of GDPR**

Processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller

- **Article 6, par. 1f of GDPR**

Processing necessary for the purposes of the legitimate interests pursued by the Company, except where such interests are overridden by your interests and fundamental rights and freedoms as data subjects

And with regard to special category data:

- **Article 9, par. 2a of GDPR**

When you have given consent to the processing of your special category data (nutritional specificity, health, ethnic origin) for one or more specific purposes

- **Article 9, par. 2b GDPR**

Where processing is necessary for carrying out the obligations and exercising specific rights of data subjects in the field of social protection, in so far as it is authorized by the Union or national law.

And as regards data relating to criminal convictions and offences:

- **Article 10 of GDPR**

Where processing is authorized or required by the Union or national law.

## **6. Disclosure to third parties**

The COMPANY does not proceed to any unauthorized disclosure or transfer of your personal data to third parties. Therefore, it will not share your data with third parties for marketing purposes.

It uses processors, i.e. third parties, providing services thereto. It has contractually bound the processors in order not to be able to manage your personal data unless it gives them specific instructions and thus they will not share your personal data with anyone other than the Company itself, while it will retain your data safe for the period that it has indicated to you.

In some cases, it may have a legal obligation to disclose your data. Such a case occurs on the basis of a court order or when it cooperates with other public authorities and bodies within the European Union, under provisions of the EU or domestic law.

The COMPANY may, therefore, disclose or transfer your data to third parties, provided the legal requirements are met, namely when there is:

- Previous consent on your behalf as data subjects;
- Legal Obligation to disclose data to Competent State Agencies and Organizations and to the relevant Judicial and Prosecution Authorities, if lawfully and competently requested.

## **7. Retention Period of your Data**

The COMPANY shall retain your personal data for as long as the processing purpose lasts. Upon its expiration, the COMPANY shall lawfully retain your personal data when this is necessary in order to comply with a legal obligation thereof arising from the provisions of the Union or National Law and where retention is necessary to substantiate, exercise or support legal claims of the Company.

## **8. Which are your rights**

According to the General Data Protection Regulation, depending on the legal basis on which COMPANY is based to process your data, you have the following rights:

### **8.1 Right of Access**

You have the right to receive:

- confirmation as to whether or not your personal data are being processed and
- a copy of such data

You may submit your request to access your personal data in writing, by email to the Company

You may not want all the personal data that the Company has on you. For this reason, it would facilitate and speed up the process if you clarified to the Company which data do you precisely want.

When requesting access (to personal data), it is necessary to include the following information:

- Your name and contact details
- Any information that the COMPANY uses to identify you or to differentiate you from other people with the same name, such as a code, etc.
- Details or relevant dates to help the Company identify what you need. You can use the form below.

When can the COMPANY refuse to grant access?

The Company may refuse to satisfy the right of access if your data include other person's personal data unless the other person has consented to the disclosure of his or her data or it is reasonable that the said information is provided to you without the consent of the other person.

In order to make the relevant decision, the Company will need to regulate your own right of access vis-a-vis the other person's rights with respect to his or her own information.

The Company shall also be entitled to refuse to grant access when this is clearly unfounded or abusive.

In any case, the Company should notify you and justify its decision. It should also inform you of your right to make a complaint to the Data Protection Authority or even to appeal before Courts.

How long will it take for the COMPANY to respond?

The COMPANY must answer your request within a month.

In specific cases extra time may be needed to assess your request and up to two months to answer.

If it is going to use the additional time, the COMPANY will inform you within one month of the reason why it needs more time.

Can the COMPANY charge a fee for satisfying my right of access?

A copy of your personal data will be provided to you free of charge. However, if your claim is manifestly abusively repeated or excessive, it may charge you a fee for the administrative costs associated with it.

## **8.2 Right to Rectification**

You have the right to ask for your data to be rectified when they are inaccurate or completed when they are incomplete.

In order to exercise your right, you must inform the COMPANY that you dispute the accuracy and completeness of your personal data. You will need to identify what data are inaccurate or incomplete, explain how the COMPANY will have to correct them and provide relevant evidence of inaccuracies.

When you ask the COMPANY to rectify your data, it will thoroughly check whether the data are accurate or not, on the basis of the evidence you will provide thereto and those held by it. It will then let you know if it has rectified, erased or completed

the data. In case the COMPANY considers that the inaccuracy or incompleteness of the data is not substantiated, it will inform you accordingly, providing at the same time a justification for its negative response. If it has disclosed the data to third parties, the COMPANY will contact them and inform them of the rectification or completion of the data, unless this is impracticable or requires disproportionate efforts. At the same time, if you wish, it can inform you to which recipients it has transferred your data.

### **8.3 Right to Erasure**

You have the right to request the erasure of your personal data if you no longer wish to have such data processed and if there is no legitimate reason for the COMPANY to hold them as Controller.

In particular, this right shall be exercised:

- when the legal basis of processing is your consent and you withdraw it, so, if there is no other legal ground for the processing, data must be erased;
- where your data are no longer necessary in relation to the purposes for which they were collected or otherwise processed or illegally processed or if you object to the processing thereof and there are no overriding legitimate grounds for the processing; and, finally,
- if the data have been collected illegally or when you were a child within the frameworks of provision of an on-line service.

It should be noted, however, that this is not an absolute right, as further retention of personal data by the COMPANY is lawful when it is necessary for reasons such as compliance with a legal obligation of the Company or the establishment, exercise or defence of legal claims.

The COMPANY is entitled to refuse to erase the data in the following cases:

- When retention of data is necessary for exercising the right of freedom of expression and information;
- When retention of your data is a legal obligation;
- When retention of your data is necessary for reasons of public health;
- When retention of your data is necessary for the establishment, exercise or defence of legal claims;

- When erasing your data would significantly hinder or render processing impossible for scientific or historical research purposes.

#### **8.4 Right to Restriction of Processing**

As an alternative to the right to erasure and the right to object, you have the right to request the restriction of your data processing only where one of the following applies:

- The accuracy of your data is contested by you and the Company as Controller considers the request;
- When processing is unlawful;
- When data are no longer necessary for the purpose of the processing, but you are requesting their retention for the establishment and defence of your legal claims;
- When you have objected to processing and the COMPANY as Controller examines whether the legitimate grounds thereof override yours.

This right may be combined with the right of rectification and the right to object, and in particular:

1. If you request correction of your inaccurate data, you may request that the processing be restricted for as long as the COMPANY examines the request for rectification or
2. If you request the right to object, you may request at the same time the restriction of processing for as long as the COMPANY examines the request to object.

#### **8.5 Right to Data Portability**

You have the right to receive your personal data that have been processed by the COMPANY as controller in a structured, commonly used and machine readable format (e.g. XML, JSON, CSV etc.).

You also have the right to ask the Company to transmit those data without hindrance directly to another Controller.

The right to portability can only be exercised by you when the following conditions are cumulative satisfied:

- Personal data are processed by automated means (i.e. printed records are excluded);
- The processing is based either on your consent or on the performance of a

contract to which you are a party (Article 6 par. 1b of GDPR);

- Personal data concern you as data subject and have been provided by you;
- The exercise of the right does not adversely affect the rights and freedoms of others.

### **8.6 Right to object**

You have the right to object at any time and on grounds related to your particular situation to processing of personal data concerning you when processing is based either on a task carried out in the public interest or on the existence of a legitimate interest pursued by the company, including profiling.

The COMPANY shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms as data subject or for the establishment, exercise or defence of legal claims.

### **8.7 Right to Non-Automated Individual Decision Making including Profiling**

If the COMPANY is required to make a decision that produces legal effects concerning you based solely on automated processing, including profiling, we inform you of the following:

- The COMPANY as controller may lawfully take such a decision only if you have given us your explicit consent or when the decision is necessary for entering into or performance of a contract between us or if such a decision is authorized by the Union or National law, which also lays down suitable measures to safeguard the data subject's rights.
- If such a decision is taken as necessary for entering into or performance of a contract between us, namely the COMPANY as the Controller and you as the data subject or based on your explicit consent, you have the right to contest the decision so that the COMPANY will be obliged to implement suitable measures to safeguard your rights, at least the right to obtain human intervention in decision-making, or the right to express your point of view and contest the decision as data subject.
- If the COMPANY intends to process data automatically, including profiling, it will provide you, when receiving the data (when it has collected them from you) or in a reasonable time (when such data have been taken from another source), also the following additional information:
  - whether and to what extent automated decision-making, including

- profiling, takes place;
- on the logic involved;
- on the importance and the foreseeable consequences of the processing;
- information on the subject's right to object, which is presented clearly and separately from any other information.

You are entitled, in the case that profiling takes place, to obtain restriction of processing at any stage thereof.

The COMPANY will be obliged to erase the relevant personal data if profiling is based on your consent and this is revoked or if you exercise the right to erase your data and if there is no other legal basis for processing in accordance with the provisions of Regulation.

You have the right to object at any time and on grounds related to your particular situation to processing of personal data concerning you when processing is based on the existence of a legitimate interest pursued by the company, including profiling and the COMPANY shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms as data subject or for the establishment, exercise or defence of legal claims.

#### **9. Right to lodge a Complaint with the Data Protection Authority**

If you find out that your personal data are being unlawfully processed or your rights in connection with your personal data have been infringed, provided you have previously contacted the Company's Data Protection Officer (DPO) about the relevant issue, that is you have exercised your rights vis-a-vis the Company and you either did not receive a reply within one month (the deadline being extended to two months in case of a complex request) or you believe that the response you received from the Company is not satisfactory and your issue has not been resolved, you can contact the Data Protection Authority, 1-3 Kifisias Avenue, PO Box 11523 Athens [complaints@dpa.gr](mailto:complaints@dpa.gr), fax 2106475628 (for more information, see also the Authority's Portal [www.dpa.gr](http://www.dpa.gr)).

#### **10. Security of Personal Data**

The COMPANY implements appropriate technical and organizational measures to ensure an adequate level of protection of personal data in order to prevent the

destruction, loss, alteration, unauthorized access, disclosure or transfer to a non-entitled person or entity in any way.

The COMPANY has business continuity and recovery plans, which it periodically tests and updates; it has in fact established and implemented appropriate policies and procedures for the security and protection of the data it processes.

In addition, to that purpose, the Company has reviewed the contracts it holds with the processors to commit them to respect your personal data under the GDPR by taking and enforcing measures to secure them from risks of destruction, loss, alteration unauthorized access, disclosure or transfer to a non-entitled person or entity, in any way and by signing a confidentiality clause.

### **11. Links to other websites**

When we provide links to websites or other Organizations, this personal data protection notice does not cover the way in which these sites or Organizations process your personal data and the information provided by you in general. That is why we encourage you to read the privacy policies of other websites you visit.

### **12. Facebook**

We maintain a Facebook page for your information. We do not share your data with another organization, but Facebook Ireland itself has access to your data. For this reason, please read the Privacy Policy of this company.

### **13. Revision of the Personal Data Protection Statement**

This statement is subject to periodic revisions and updates. In this case you will be informed through the Company's website.

Model Letter

(Your full address)  
(Your phone number)  
(Your e-mail address)  
(Date)

To the COMPANY  
address .....  
Tel. ....

REQUEST FOR PROVISION OF PERSONAL DATA

Dear Sir / Madam,

According to Article 15 of 2016/679 EC, please provide me, at the latest within one month of receiving this request, my personal data concerning the subject and the period from .....

If for the provision of the above data, additional information is required to be furnished by me or the payment of a reasonable fee, please inform me immediately.

If you are not in charge of receiving my request, please forward it to the responsible officer and to the Data Protection Officer of the COMPANY.

If you need advisory support to handle my request, the Data Protection Authority may assist you.

Sincerely,  
The Requesting Party

## **Cookies Policy**

### 1. What are cookies

Cookies are small text files with information that a website (specifically the web server) stores on a user's computer / tablet / mobile phone so that whenever the user connects to the website, the latter retrieves those information and provide the user with services relevant to it. A typical example of such information is the user's preferences on a website, as these are indicated by the user's choices on that website (e.g. selection of specific "keys", searches, advertisements etc.).

### 2. Which law applies

Cookies are governed by the "e-Privacy" Directive 2002/58/EC as amended by Directive 2009/136/EC (which has been incorporated into the Greek law by L 3471/2006), as it is explicitly provided in the Data Protection Regulation 2016/679, Recital 173.

According to the applicable law 3471 / 2006 (see article 4 par. 5 of this law, as amended by article 170 of Law 4070/2012) "The installation of "cookies" is allowed only with the consent of the user and after appropriate information thereof".

For this reason, on the first visit of the user to the website www....., relevant popup windows are displayed, where the visitor user can declare his / her consent to the installation of the specially mentioned cookies, which are non-functional cookies aimed at improving the services presented on the website, such as:

- connection to social media,
- configuring audio / video players, by adapting the information to the user's personal preferences,
- statistical analysis cookies on the number of visitors to the website and the number of pages viewed without instant identification of the user.

### 3. Are cookies installed without the prior consent of the user?

There are "cookies" that have been evaluated by the Working Party of articles 29 (see Wp29 Opinion 4/2012) as being technically - functionally necessary for connecting with the website or for the provision of internet service. For these, the law does not require prior consent.

We can distinguish the following categories:

- Cookies that are necessary to identify and / or maintain content entered by a

subscriber or user during a session on a site throughout that connection. (For example, such cookies are required when completing an online form). In the same category, persistent "cookies" are installed for the same purpose and last for a few hours.

- Cookies that are necessary to authenticate the subscriber or user in services requiring authentication.
- Cookies installed for security purposes, such as cookies that detect repeated failed attempts to enter a user's account on a particular website.
- Cookies with multimedia content, such as flash player cookies, during a session on a website. Such are, for example, cookies that are installed by viewing a video on the website that the user has visited.
- Cookies that are necessary for the implementation of the load balancing technique in a connection to a website.
- Cookies that "remember" the choices of the subscriber or user regarding the presentation of the website (e.g. "cookies" concerning the choice of language or the presentation of search results on a web page).
- Third party social plug-in content sharing cookies, for logged in members of a social network.

#### 12.4 How to control cookies

You can delete all cookies already on your computer, as well as set up most browsers in a way that prevents cookies from being installed. However, in this case, you may need to customize certain preferences yourself whenever you visit a site, and some services may also not work.

For more information on cookies, including how to control and / or delete cookies you can visit the following links:

[http://ec.europa.eu/ipg/basics/legal/cookies/index\\_en.htm#section\\_2](http://ec.europa.eu/ipg/basics/legal/cookies/index_en.htm#section_2)

<https://www.aboutcookies.org>

#### 12.5 How do I know if the cookies policy changes

Any modification to this cookie policy will be displayed in time on the Company's website.