

PRIVACY AND PROTECTION NOTICE REGARDING PERSONAL DATA

GENERAL PROVISIONS

1. Who is accountable for your data? Who shall you address for the exercise of your rights?

1.1. Responsible for processing your data is the SA company under the name “**ELECTROVAM S.A.**” and the distinctive title “**electrovam**” (:<<the company>>), based in the Industrial Area of Oreokastro Thessaloniki, Str. Patriarchou Athinagora n.2, as legally represented by the following call center 2310 681834 & 2310 683649, and the e-mail address info@electrovam.gr.

1.2. The accountable Processing Company, as stated above, has appointed a Data Protection Manager (: DPM), with the e-mail address info@electrovam.gr. Through the aforementioned e-mail address of the DPM, you can address all your requests regarding the exercise of your rights, as mentioned below. (see under 3.1-3.7)

2. Company’s principles regarding transparent information

2.1. Any piece of information provided in the present document and any other information that may be requested in the future, is provided free of charge, subject to the requirement not to be repeated, excessive or manifestly unjustified. (see under 2.3.)

2.2. For each of the above-mentioned rights that you exercise, the Company will reply within one (1) month from the admission of your request or in the case of objective difficulty, complexity of the request or the number of requests, the Company shall respond within the maximum period of three (3) months in total, either by exploiting your request or by justifiably refusing to perform what you have requested for legitimate as expressly specified in General Data Protection Regulation 2016/679, according to the relevant internal procedure.

2.3. In the event that the Company considers that one of the above-mentioned rights is being exercised manifestly unjustified or the request is excessive or (to a greater extent) has a repetitive character, it is entitled, on the one hand, to charge you with

a reasonable fee so as to provide further information (which in principle is free of charge) and, on the other hand, to refuse to respond to your request.

2.4. In case the Company has reasonable doubts regarding your identity when you submit a request for exercising one of your above rights, it may appeal for further information, necessary for confirming your identity before processing your request.

2.5. In the event that the Company delays beyond the reasonable period of time to respond to your request, and in any other occasion where you suspect that your rights are being violated, or the Company does not comply to its obligations regarding the protection of your data, you have the right to submit a complaint to the supervisory authority. (Hellenic Data Protection Authority, Athens, Kifisia, 1-3, P.C. 115 23, Athens, contact@dpa.gr, +30 210 6475600)

2.6. You reserve the right to withdraw your previously given consent at any time by submitting a relevant request document to the e-mail address of the Data Protection Manager. (see how under 1.2.)

3. Which are your rights in relation to the Personal Data you have provided uswith?

3.1. Right to be informed

You reserve the right to request information in relation to Personal Data that we have received from you and we store for one or other purposes, as describe velow. (under 4) The present text constitutes in its entirety a manual of basic information and understanding of the philosophy of regulatory framework that conditions the protection of your personal data. Update, further explanation and clarifications, regarding this text, can be given to you, following your submission of a request to exercise your right to be informed. (see how under 1.2.)

3.2. Right to access

You reserve the right to request from our Company access to your data, which we maintain, and confirmation as to whether they are processed, and more specifically, information about the purposes of processing, the categories of personal data, the recipients or the categories of recipients, the period for which the data will be stored and processed, the right to file a complaint to the Hellenic Data Protection Authority, any available information about the origin of the data, in case they have not been obtained by you, the existence or not of automatic decision-making including profiling and the related methodology, safeguards about the policy we follow when transferring to third countries, and a copy of the personal data that are being kept and processed. (see how under 1.2.)

3.3. Right to correction

You reserve the right to request from our Company correction of your data, in case any of the data that we have the right to process has been altered or falsely submitted. (see how under 1.2.)

3.4. Right to erasure

You reserve the right to request from our Company complete or partial erasure of your data that we are entitled to maintain and process either because they are no longer necessary for the completion of the purposes for which they were collected, either because you withdraw your consent, or because the data were collected for a reason you deem illegal. Our company, within a reasonable period of time (no more than a month, and under conditions, if there is any difficulty, no more than three months in total) shall reply to you confirming the total or partial erasure pf your data accordingly or the inability to erase specific data, in case a 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 their maintenance. In such a case, on the one hand, you have the right to lodge a complaint with the supervisory authority, and, on the other hand, the right to an effective judicial remedy. (see how under 1.2.)

3.5. Right to restriction

You reserve the right to request from our Company to restrict the processing of your data, in terms of quantity, time, or in relation to the purpose of its processing, and more specifically, (a) either because you doubt the accuracy of your data and the time needed by the Company to verify its accuracy, (b) either because you consider illegal the processing of the data, and instead of its erasure you opt for its restriction, (c) either because its use for the Company is no longer needed, however, you do not wish for its erasure since their preservation shall serve for some judicial 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 prevail over the Company's legitimate grounds for processing. (see how under 1.2.)

3.6. Right to portability

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

The present right is exercised, subject top the conditions of erasure, as describe above (see under 3.4.), and its exercise should not adversely affect the rights and freedoms of others. (see how under 1.2.)

3.7. Right to object

You reserve the right to object to the use of your data that is subject to processing, unless the Company presents authoritative and legal purposes, which prevail your interests or is necessary for establishing, exercising, or defending legal claims.

3.8. Exercise of rights

The exercise of the above-mentioned legal rights can be carried out with the completion of <<Subject special request form>>, that is provided by our Company in the context of the foreseen relevant procedure of managing your requests.

SPECIFIC PROVISIONS (regarding the individual categories of Personal Data Subjects)

(A) CUSTOMER-SUPPLIER-PARTNER & POTENTIAL CUSTOMER-SUPPLIER-PARTNER

A.1. Nature of Data- Processing Purposes – Legitimate Basis

a. Your data (name, e-mail address and/or address and/or profession and/or products you are interested in), which are collected pre-contract, either in case of filling an electronic communication form on our website, either through directly by e-mail or telephone communication, either filling a written form, are subject to processing for the purpose of investigating the potentiality of partnership with the Company, in order to pursue its commercial purposes in response to the requested communication to investigate the probability of a transaction with you.

b. Your data [personal data of identification (name, VAT, DAT, AMKA), home address, contact information, bank account number, e-mail address, product/service order information, international equipment identification, full billing details, shipping address, choice of payment method, information about the execution of payment] that you provide yourself, by telephone, by e-mail and/or written correspondence, in the context of our transaction, are eligible in processing for the purpose of implementing the contract/ cooperation, but also our obligation to comply with the labor, insurance and tax legislation.

c. Legitimate basis for the processing of the above-mentioned data (under A.1.a.) is the service of our Company's legal benefits for the purposes of commercial promotion, [article 6 (1) (a) of Regulation (EE) 2016/679 regarding Personal Data Protection], while the legitimate basis for the processing of the data (under A.1.b.) consists the execution of our contract, as well as our compliance with the legislation [article 6 (1) (b) & (1) (c) of the above regulation].

A.2. Data Transmission-Promotion

Your data (which have been disposed for the service of the goals described above under A.1.a. & b.) are not intended (since it is not required for the purpose that they are collected) to be object of transmission to any organization outside the Company.

As a Company-Data Processing Executive we have taken all security measures necessary, in order not to allow access to your personal data to anyone else rather than appropriate persons authorized to do so, and only for the intended purposes of the present processing. In the context of our business activity, service and pursuit of our legal benefits, we may disclose your data in a legitimate manner to external partners of our Company, such as contractors and subcontractors, legal counsellors, accountants, technical counsellors, transport service companies, IT service providers etc. These persons receive only the data that is absolutely necessary for the completion of the project they have undertaken; they process it only after direct order and authorization and exclusively for the purposes stated in the present "Privacy and Personal Data Protection Policy". We take care that these persons take into account the present policy, as well as respect and apply the entirety of the European and National legislation regarding Personal Data, signing collectively the relevant contractual terms.

A.3. Time Period of Data Preservation

- a. We are going to maintain your above-mentioned data, which have economic, insurance and tax aspects, for as long a period of time as the tax and/or insurance legislation defines.
- b. The rest of your data, for which it is not imposed by the legislation to be stored for a specific period of time, are erased within five (5) years from the expiration date of or contract or cooperation.
- c. Data of yours that have become object of legal proceedings and concern the Company for any reason are sustained for as long as required until the final case of proceedings.

(B) GUESTS TO OUR COMPANY'S FACILITIES

B.1. Processing Purpose- Legitimate Basis

In the context of defending the safety of people who visit our Company's facilities, but also safeguarding the ownership of the Company's interests, a close circuit television (CCTV) functions, which records (image) on a continuous basis the movement in our facilities, receiving data that concern the definition of your identity. The maintenance of the above-mentioned data (image of guests) takes place for the preservation of the Company's legal benefits, which are the same as ensuring people's and material objects' safety (indicatively buildings, technical equipment etc.) that are part of our Company's facilities. The close circuit television (CCTV) is installed after the installation of special informative signs in our facilities and after informing the people in them.

Legitimate basis of receiving, preserving and processing your above-mentioned data constitutes the preservation of our Company's legal benefits, which identify with ensuring people's and material objects' safety, which belong to our facilities, according to article 6 (1) (a) of Regulation (EE) 2016/679.

B.2. Time Period of Data Preservation

In order to complete the above-mentioned purpose of processing, we consider reasonable and necessary the time period of fifteen (15) days for the preservation of your relevant data. After the expiration of the 15 days, from the time of your entering our facilities, the relevant file with the entirety of your data will be erased, while in the event of an incident (e.g. theft, robbery) involving the Company's goods, we store the images, in which the particular incident is recorded, in a separate file for the period of thirty (30) days.

(C) Candidate Workers

C.1. Processing Purposes – Legitimate Basis

The purpose of processing your data [personal identification data (name, VAT, DAT, AMKA), home address, contact information, e-mail address, education data and/or professional training and experience, marital status] constitutes the assessment of the possibility of your recruitment from our Company, while the legitimate basis of this assessment consists your consent to article 6 (1) (a) of Regulation (EE) regarding Data Protection.

C.2. Time Period of Data Preservation

For the completion of the processing purpose that refers to the investigation of job occupation in our Company, we consider reasonable and necessary the time period of twenty-four months for storing your relevant data. After the 24 months from receiving your Curriculum Vitae (CV), the relevant file with the entirety of your data will be erased.

C.3. Indication

It should be noted that before processing your personal data for the investigation of potential job occupation from the Company, you are asked to complete and sign an "Application Form of Candidate Employee", while in case of recruitment by our Company, you are able to learn more about the processing of your data and the exercise of your legal rights in "**Privacy and Personal Data Protection Policy**".

4. GUARANTEE

We guarantee that the Company will exhaust any technical and organizational data safety measures and will make optimal, minimum, and only absolutely necessary us and processing of data, as the law determines and strictly and exclusively for the sole purpose you have provided us with them.