	ΕΓΧΕΙΡΙΔΙΟ ΠΡΟΣΤΑΣΙΑΣ ΠΡΟΣΩΠΙΚΩΝ ΔΕΔΟΜΕΝΩΝ
	ΠΟΛΙΤΙΚΗ ΠΡΟΣΤΑΣΙΑΣ ΠΡΟΣΩΠΙΚΩΝ ΔΕΔΟΜΕΝΩΝ ΕΝ (ΠΠΔ.02)

## ΠΟΛΙΤΙΚΗ ΠΡΟΣΤΑΣΙΑΣ ΠΡΟΣΩΠΙΚΩΝ ΔΕΔΟΜΕΝΩΝ ΕΝ (ΠΠΔ.02)

### ΠΙΝΑΚΑΣ ΑΝΑΘΕΩΡΗΣΕΩΝ

ΑΡΙΘΜΟΣ ΑΝΑΘΕΩΡΗΣΗΣ	ΗΜΕΡΟΜΗΝΙΑ	ΠΕΡΙΓΡΑΦΗ ΤΡΟΠΟΠΟΙΗΣΗΣ
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ΘΕΣΗ	Υπεύθυνος Προσωπικών Δεδομένων	Διευθύνων Σύμβουλος
ΟΝΟΜΑ	Μιχάλης Μέλης	Διονύσης Χιντζίδης


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## 1 Introduction

Performance Technologies SA recognizes that the protection of customer personal data is of the utmost importance. For this reason, appropriate measures are taken to protect processed personal data and to guarantee that personal data processing is conducted, in all cases, in conformance with the legally specified obligations, by both the Company and the third parties who process personal data on behalf of the Company.

## 2 Communication Responsible for Personal Data Protection Issues

Performance Technologies SA, headquartered in Athens Greece at the address Evrimedontos 4 (e-mail: [info@performance.gr](mailto:info@performance.gr); tel. no.: +30 210 9947100; fax: +30 210 99447111; website: <http://www.performace.gr>) states that, in the course of performing its business activities, it conducts processing of customer personal data, in accordance with the domestic legislation in effect and the EU Regulation 2016/679 on Personal Data Protection regulating the processing and free movement of personal data (General Regulation for Data Protection, to be referred to hereinafter as the *Regulation*) in effect.

Concerning any issue arising from the processing of personal data the persons involved may send a message to e-mail address: [gdpr@performance.gr](mailto:gdpr@performance.gr) or call telephone number 210 9947100.

## 3 Classification of personal data to be processed

Only the absolutely necessary and appropriate personal data shall be collected and processed by Performance Technologies SA in its pursuit to attain of the stated Company goals. The personal data we collect for the attainment of these goals are divided into two categories:

### A. Personal data supplied by you, such as:

- Identification data (full name, date of birth, ID card or passports numbers, tax ID no., Public Finance Service, etc).
- Communication data (mailing address, home/ mobile phone numbers, e-mail addresses).
- Other data such as professional specialization, job post description, etc.

The data used for your identification and/or legitimacy, including any communication data, are necessary for any transactional or contractual relations with the Company. Insofar as the remaining data to be processed are concerned, such data shall in all cases be based on the contractual relation with the Company, present or future, and/or the service on offer.

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We inform you that you are to notify Performance Technologies SA on time, concerning any change in any aforementioned data you may have submitted on your own initiative, and to respond to any of Company requests to update such data.

**B.** Personal data involving you collected by Performance Technologies SA from other sources, such as:

- Data from the use of Company electronic and/or digital goods and services, such as identification cookies, IP protocols or other identifying personal data, governed under special terms of use of the Company applications.
- Data involving you that are publicly accessible either through electronic means or other media.

Performance Technologies does not collect or process special categories of personal data such as data relating to racial or ethnic origin, political views, religious or philosophical beliefs, trade union affiliation, genetics or biometrics, health or sexual orientation of natural people.

The personal data processed by Performance Technologies SA are stored in written form and/or electronic or magnetic media.

#### 4 The purpose of processing and manner of use of personal data

The data to be collected are necessary for:

- **The supply of goods and services, the performance and the overall fulfillment of Company obligations to you.**

We collect your personal data in order to render Company goods and services. Identification and communication data are required for the drawing of our mutual agreement contract in order to enable the Company to provide you with our goods and services. We process your data within the scope of management of Company customer lists, confirmation of the status of customer order and customer participation in any business event or training.

- **Company communication with you and the management of Company relations with you**

It may be necessary to communicate with you through email or by phone for management tasks, such as the handling of your requests or complaints and in general, any services you may request. It may be necessary to use your communication data for your participation in any customer preference research, customer satisfaction survey or for your information on the development of your participation in any business event.

- **The improvement of Company services and the protection of Company interests**

We may have to use your data for improvement of the services rendered to you in effectively meeting your expectations.

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- **Your information on Company news.**

Subject to our mutual agreement, the Company sends informational material on Company goods and services or business events through email, by phone or standard mail.

- **Conformance with legal obligations**

We process your personal data in conformity with legal requirements, and specifically the provisions of labor, insurance or taxation legislation, court judgments, government authority requirements, inquiries into reports, prevention and confirmation of fraud, pricing accuracy controls and statements involving possible threats to the security of any person and violations of Company business policies.

- **The safeguarding of Company legal interests and the protection of goods and services.**

We process personal data acquired through CCTV media, thus facilitating the Company to protect the security of natural persons, materials and installations.

## 5 Legal reasons for personal data processing

Personal data supplied to Performance Technologies SA are subject to processing on condition of occurrence of legal reasons.

Legal reasons for processing your personal data may include:

- Need for processing your data within the framework of fulfillment of any contractual or pre-agreement stage obligations, subject to your request for the procurement of Company goods and services to you, including the management of your customer list, confirmation of the status of customer orders and the execution of your orders.
- Safeguarding and protection of your legal interests that may include personal and installation security, Company network security and informatics systems, protection from malicious software, legal claim support, exercise and substantiation, overall organization and development of Company business activities and the promotion of Company goods and services.
- Conformance to any legal obligation that may specifically consist in obligations resulting from the provisions of labor, taxation or insurance legislation.
- Securing consent subject to preconditions specified in the legal framework, such as receipt of updates on goods, services and business events.

## 6 Who is notified of your personal data:

Performance Technologies SA may indicatively notify your personal data to the following categories of recipients:

- **Affiliated subsidiaries of our Company Group**

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The Company may communicate data to the companies in the Performance Technologies Group for the purpose of management and service to customers, suppliers and associates or for reasons of conformity with legal obligations.

The Company shall legally guarantee that any third party executing data processing on its behalf shall fulfill the preconditions and provide sufficient assurance in the application of the appropriate technical and organizational measures, so that the processing of your personal data abides by the protections of such third party interests.

- **Company employees**

These Company employees are in charge of the evaluation and completion of your requests, the management and the execution of your present agreement, the fulfillment of the obligations stemming from such agreement including any relevant obligations specified by law. Your personal data are treated with the utmost confidentiality and privacy as any employees processing your personal data possess sufficient and competent knowledge in data protection and are bound by a confidentiality clause and/or the due regulatory obligation of conformance to the confidentiality clause.

- **State authorities, law enforcement agencies in the capacity of exercising their duties**

The Company may have to share your personal data with the competent authorities, law enforcement agencies or any other third parties to the extent specified by the law, within the context of prevention or commitment of criminal acts, illegal activities or any situation that may involve possible threats against the security of any person, or violations of our policies.

- **In the course of assignment of projects to legal consultants, accountants, auditors, insurers etc.**

The Company, in the course of management of court cases for the purpose of substantiation, exercise and support of legal claims against third parties, may communicate your personal data to external associates-lawyers, in case their cooperation is deemed necessary for the handing of any case and the defense of the rights of the Company. Furthermore, Performance Technologies SA shall cooperate with accountants, auditors, insurers, or any third party assigned with personal data processing on behalf of the Company.

In such cases Performance Technologies SA shall be responsible for the processing of your personal data, determine the separate elements of the processing, sign a special contract with third parties assigned by the Company with processing activities in order to secure that the processing is to be conducted in accordance with the legal framework in effect, so that any natural persons may freely and unrestrictedly exercise the rights specified by the legal framework.

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## 7 Communication of your personal data to third countries

Your personal data may be communicated to and stored in locations beyond the European Union (EU) or the European Economic Zone (EEZ) including any countries operating with differing levels of personal data protection. Reasons for such communication of personal data may include guarantees on a case-by-case basis, depending on the recipient, such as European Commission resolutions on competence or formal contractual clauses, approved by the European Commission in effect at any time. In case of absence of such clauses, the aforementioned communication is based on the concrete exceptions specified in Regulation requirements, such as the need for communication for the execution of the contract between the Company and the person involved in the data or the consent of such person.

Additionally, the communication may on a case-by-case basis be conducted for reasons of substantiation, exercise or support of legal claims or as an exception in cases, which such communication may be required pursuant to a court judgment, administrative authority requirements, international agreement or legal interests of the Company. In any case, guarantees shall be in place in order to secure a proper level of protection and legitimacy of the communication.

## 8 Data storage time

The time for data storage shall be specified based on the following special criteria depending on the case:

In case the processing is required as an obligation stemming from the provisions of the legal framework in effect, your personal data shall be stored for the time specified by the relevant legal provisions.

In case the processing is conducted pursuant to a contract, your personal data shall be stored for a period of time required for the execution of the contract and for the substantiation, exercise and/or support of legal claims supported by the contract.

Within the context of promoting goods and services, your personal data shall be stored until the revocation of your consent. The execution of such revocation is at your own discretion at any time. The revocation of your consent shall in no case affect the legitimacy of the processing provided by consent at a time prior to its revocation.

In order to revoke your consent, you are advised to contact the Performance Technologies by sending a message to the email address: [gdp@performance.gr](mailto:gdp@performance.gr) or by calling phone number 210 9947100. You may also use the unsubscribe options, by following the respective link, listed in our electronic communications information.

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## 9 Your rights in relation to your personal data

All natural person data to be processed by Performance Technologies SA are entitled to the following rights:

### Right to access

You shall be entitled to know and verify the legitimacy of processing. Therefore, you shall have the right to access any data and receive supplementary information on their processing.

### Right to rectify

You shall have the right to review, correct, update or modify your personal data by contacting the Company's Communication Responsible on Issues of Personal Data.

### Right to erasure

You are entitled to submit a request to erase your personal data in our processing such data based on your consent or in cases, we are obligated to protect Company legal interests. In any other case, including the presence of a contract, the obligation to process personal data required by law or public interest, such right shall be subject to particular restrictions or may be overridden depending on the case.

### Right to restrict processing

You have the right to request restrictions on the processing of your personal data in the following cases: (a) you may challenge the accuracy of the personal data collected by the Company until the completion of all verification procedures; (b) you may object to the erasure of your personal data and request restrictions in the use of such data instead of erasure; (c) such personal data may not be needed for the purpose of processing, but nevertheless may be necessary for the substantiation, exercise and support of legal claims; and (d) you may object to such processing until completion of verification of presence of a reasonable basis involving our Company to override any of your reasons for objection to processing.

### Right to object to processing

You have the right to object at any time to the processing of your personal data in cases such as described in the foregoing, in which such processing may be necessary for the pursuit of legal interests in the Company's capacity of being responsible for such processing, including processing for reasons of direct commercial promotion and preparation of a consumer profile.

### Right to portability

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You are entitled to receive free of charge your personal data in any form allowing access to such data, use of such data or data processing with common and standard processing methods. Furthermore, you shall have the right to request from the Company, if technically feasible, to communicate such data directly to another person contracted for their processing. This right shall be applied to data provided by you and their processing shall be conducted through automated means subject to your consent or the execution of a relevant contract.

#### **Right to revoke consent**

In case the processing is provided on your consent, you shall have the right to revoke it freely and without any detriment to processing legitimacy based on your consent until the time of your revocation.

#### **Right to file complaint to the Hellenic Data Protection Authority (HDP)**

You have the right to file a complaint with the HDP (ww.dpa.gr). Tel. switchboard: +30 210 6475600; fax: +30 210 6475628; email: [contact@dpa.gr](mailto:contact@dpa.gr).

In order to exercise any of the foregoing rights you may send a message to the email address [gdpr@performance.gr](mailto:gdpr@performance.gr) or call phone number 210 9947100.

## **10 Personal Data Security**

Performance Technologies SA applies the appropriate technical and organizational measures aiming at secure personal data processing and prevention of any random use, destruction or unauthorized and/or illegal access, use, modification or disclosure of such data. However, the operations of online communications and the freedom of access to everyone shall in no case to justify the institution of guarantees preventing in all cases unauthorized third parties from acquiring capabilities to violate the applied technical and organizational measures, by acquiring access and subsequently embarking on unauthorized and/or illicit use of personal data.

## **11 Links to other websites**

The Company websites may be linked with other websites beyond the Company's control since third internet websites are beyond Company jurisdiction as they are capable of linking with the Company website. Despite our attempts to secure in all cases linkage of our website exclusively to websites sharing our privacy and security standards, the Company shall not be held accountable for privacy practices or the content of other websites.

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## 12 Amendments to the Data Privacy Policy

Any information related to the Data Privacy Policy of Performance Technologies SA, posted on the Company website, reflects the current state of data processing. In case of modifications in data processing, such information shall be accordingly updated, so that the Company website shall post in all cases the latest version of the information concerning data protection, in order to keep you updated on the extent of data protection. It is recommended that you remain posted at all times on the manner in which the Company processes and protects your personal information. All future changes concerning this Privacy Policy shall be posted in a timely manner prior to the institution of such modifications.

The foregoing update applies Regulation (EU) 2016/679 of the European Parliament and the Committee and the provisions of the domestic legislation concerning personal data protection adopted and applied within the legal framework presently in effect.

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