

PRIVACY NOTICE

Information on the Processing of Personal Data

Introduction

We would like to assure you that for the company with the name “BUSINESS AND PROJECT MANAGEMENT S.A.” and the distinctive title “BPM S.A.” (hereinafter referred to as BPM S.A.) the protection of personal data is of paramount importance. That is why we are taking appropriate measures to protect the personal data we process and to ensure that the processing of personal data is always carried out in accordance with the obligations laid down by the legal framework, both by the company itself and by third parties who process personal data on behalf of the company.

Data Controller – Contact Details of the competent person in charge for personal data

BUSINESS AND PROJECT MANAGEMENT S.A, having its registered office at the Municipality of Athens, 123 Pireos str., P.O. 11854, email: info@bpm.gr, tel: 210 74 72 820, website: <http://www.bpm.gr/>, informs that, in the context of its business activities, it processes the personal data of its customers, partners and suppliers in accordance with the applicable national legislation and the European 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 (General Data Protection Regulation, hereinafter referred to as the “Regulation”) as currently in force.

For any matter concerning the processing of personal data, please contact us directly by email: [info@bpm.gr] or by telephone [+30 2107472820], for the management of your request.

Which are the legitimate grounds for processing your personal data?

We only process the personal data you provide us with [such as indicatively, and not exhaustively, your full name, email address, telephone number, etc.], when we have a legal ground to do so.

Legal grounds for processing your personal data are:

- (a) the provision of specialized consulting services that you wish to receive from us in the areas of entrepreneurship, human resources, funding, organization and society and, therefore, the fulfilment of our contractual obligations as well as the preparatory actions necessary in the context of the contract to be concluded between us.
- (b) the legitimate interest of BPM S.A. such as the promotion of our business interests by sending wishes through emails during the festive seasons.
- (c) compliance with an obligation imposed by law, such as provisions of tax legislation.

Please note that the provision of specific personal data is a legal or contractual obligation or requirement for the conclusion of a contract. Therefore, failure to provide such data would make it impossible for BPM S.A. to comply with legislative provisions or to perform the contract between us or to fulfil the conditions for the conclusion of the contract.

How and why do we process your personal data?

- **To provide the services you wish to receive from us**

We use the personal data required in accordance with the specific contractual terms in order to carry out all actions required in the context of providing specialized consulting services in the areas of entrepreneurship, human resources, funding, organization and society.

- **To communicate with you and manage our relationship with you**

We may need to contact you by email or telephone for administrative purposes and generally for purposes of customer service, either during the pre-contractual stage or during the provision of our services.

- **To promote our business interests**

As part of our existing or potential business relationship we will send you wishes through emails during the festive periods, in accordance with the conditions set out in the relevant framework.

- **To comply with our legal obligations**

We process personal data required to comply with the provisions of tax legislation.

Where are your data shared?

BPM S.A. discloses your personal data to the following categories of recipients:

- **Employees of BPM S.A.**

To the employees of our company, who are responsible for the evaluation and satisfaction of your requests, the provision of information at the pre-contractual stage and in case you are interested in entering into a contract with BPM S.A. the proper performance of your contract with BPM S.A., as well as the fulfilment of the obligations arising from the contract or imposed by law.

Your personal data is treated with the strictest confidentiality and secrecy, as those of our employees who process your personal data have an adequate and significant level of knowledge to protect it and are bound by a confidentiality clause or are under a regulatory obligation of safeguarding the confidentiality clause.

- **State Authorities, Law Enforcement Agencies**

When this is necessary in order for an audit to be conducted and in accordance with the legal procedures, as the case may be. In addition, when disclosure is required for the support, establishment and exercise of any potential legal claims, the data will be disclosed as the case may be to the competent judicial authorities.

- **When we outsource services to external partners**

Personal data may be disclosed to external partners (legal entities to which BPM SA assigns the performance of specific tasks), such as an accounting services company, in order for them to perform tasks required by BPM SA in order for the latter to comply with the provisions of tax legislation. In these cases, BPM S.A. remains the data controller of the processing of your personal data, determines the different elements of the processing activity, and signs a specific contract with the third parties to whom it assigns the performance of processing activities, in order to ensure that data processing is carried out in accordance with the applicable legal framework and that each natural person may freely and without hindrance exercise the rights conferred upon him/her by the data protection legal

framework.

Transfers of personal data to third countries

The personal data that we process as mentioned above are not transferred to third countries outside the European Union.

Storage Time

The data storage time is decided based on the following specific criteria, as appropriate on each case:

When processing is necessary for the compliance with obligations under the applicable legal framework, your personal data will be stored for as long as required by the relevant provisions.

When the processing is based on a contractual relationship, your personal data are stored for as long as is necessary to perform the contract and for compliance with additional legislative provisions, as well as the establishment, exercise or/ and support of legal claims on the basis of the contract.

For the purposes of promoting our business interests, your personal data is kept until you object to receiving the relevant communications. This may be requested by you at any time.

To exercise the right to object, please contact us by email: [info@bpm.gr] or by telephone [+30 2107472820]

What are your rights with respect to your personal data?

Any natural person whose data are being processed by BPMS.A., enjoys the following rights:

Right of Access:

You have the right to be aware and verify the legitimacy of the processing. Therefore, you have the right to access the data and get additional information about how your data are being processed.

Right to Rectification:

You have the right to study, rectify, update or modify your personal data by contacting the person in charge for the processing of personal data in the aforementioned contact details.

Right to Erasure (“Right to be forgotten”):

You have the right to request the erasure of your personal data when we process them based on your consent or in order to protect our legitimate interests. In all other cases (for example, when there is a contract, or an obligation to process personal data as required by law or for public interest reasons), this right is subject to specific restrictions or may not apply, depending on the case.

Right to Restriction of Processing:

You have the right to request restriction on the processing of your personal data where one of the following applies:

- (a) the accuracy of your personal data is contested and until such accuracy is verified;
- (b) you oppose the erasure of your personal data and request (instead of erasure) the restriction of their use;
- (c) personal data is not required for the purposes of processing, but they are, however, required for

the establishment, exercise, or support of legal claims; and

(d) you object to the processing pending the verification whether our legitimate grounds override those of yours that form the reason of your objection.

Right to Object:

You have the right to object at any time the processing of your personal data where, as described above, such processing is necessary for the purposes of legitimate interests pursued as data controllers, as well as to the processing for direct marketing purposes, including profiling related to such direct marketing.

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, using commonly used editing methods. You also have the right to ask us, if technically feasible, to transmit the data directly to another controller. This right concerns the data you have provided to us, and their processing is carried out in a commonly used format based on your consent or in order to perform a contract.

Right to withdraw consent:

Where processing is based on your consent, you have the right to withdraw it. The withdrawal of your consent shall not affect the lawfulness of the processing based on consent before its withdrawal.

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Right to lodge a complaint with the Hellenic Data Protection Authority

You have the right to lodge a complaint with the Hellenic Data Protection Authority (www.dpa.gr) through the following link: <https://eservices.dpa.gr/> upon completion of the appropriate electronic form depending on the kind of complaint.

Personal Data Security

BPM S.A. implements appropriate technical and organizational measures aimed at the safe processing of personal data and the prevention of accidental loss or destruction and/or unauthorized access to, use, modification or disclosure thereof. In any case, the way in which the internet operates and the fact that it is free to anyone cannot guarantee that unauthorized third parties will never be able to violate the applicable technical and organizational measures by gaining access and possibly using personal data for unauthorized and/or unfair purposes.

Amendments to this Privacy Notice

We reserve the right to update and modify this Privacy Notice whenever necessary to reflect any changes in the way we process your personal data or any changes in the legal framework. In the event of such changes, we will publish the updated version of this Privacy Notice on our website. The changes will be effective from the date of publication on our website.