# Information on Personal Data Protection in accordance with Regulation (EU) 2016/679

FHL Kyriakidis SA with respect to personal data, complies with the General Data Protection Regulation (EU) 2016/679 - GDPR in the context of its activity and scope and takes the respective technical and organizational measures for the effective protection of personal data, in accordance with the GDPR.

## 1. Controller – Contact Details

FHL Kyriakidis SA is Controller with the following contact details:

Address: Industrial Park of Prosotsani, GR 662 00 Drama, Greece

Phone: +30 25220 23514 -5

Data Protection Officer e-mail: <a href="mailto:dpo@fhl.gr">dpo@fhl.gr</a>

## 2. What personal data is FHL Kyriakidis SA processing and how?

The personal data collected and processed by FHL Kyriakidis SA are limited to those necessary for the specific and clearly defined purpose and the specific legal basis, for each circumstance.

In this context, the processing that takes place concerns the personal data you provide to FHL Kyriakidis SA:

- when you visit our official web sites or our facilities, when using our services or interact with us, for example by sending a contact form, like:
  - o Communication data (Name, postal address, phone numbers, e-mail address).
  - o CVs
  - Cookie
- during your recruitment and working life, where processing is based on the performance of our contract or legal obligation:
  - o Identity Data (User ID, Full Name, Father and Mother Name, Photo, ID or Passport Number, Issuing Authority, Release Date)
  - o Communication data (Name, postal address, phone numbers, e-mail address)...
  - Demographic data (Nationality, Nationality, Religion, Date of birth, Place of birth, Country of birth, Tax code, Tax code)
  - Health Data
  - CVs
- when you visit our facilities, we collect your images through the video surveillance system (CCTV) we have installed and use

# 3. Purpose and Lawfulness of processing?

Personal information is collected in accordance with the GDPR and the applicable legislation, either at the beginning of your relationship with the company or later, and are processed on a legal basis:

- i. Consent to the processing of your personal data for one or more specific purposes (article 6.1(a) GDPR)
  - To identify you or to send you our newsletter
- ii. For the performance of a contract or to sign a contract with you personally (article 6.1(b) GDPR)
  - when we use your personal data based on the responsibilities and duties we have assigned to you as employee,
  - when we evaluate your information to hire you
- iii. For compliance with our legal obligations (article 6.1(c) GDPR)
  - to fulfill our obligations to your insurance or tax institutions,
  - To fulfill our obligations under applicable law on disclosure to Legal and Supervisory Authorities
- iv. In order to protect your or another natural person's vital interests (article 6.1(d) GDPR)
  - For the safety of the lives of our customers, guests and staff
- v. for the purposes of our superior legitimate interests (article 6.1(f) GDPR)
  - To develop and improve our services through your activities and interests.
  - Complaints management
  - For the protection and security of our IT systems
  - For the protection and safety of our facilities.
  - Prevention of illegal activities and the safety of customers, visitors and staff, including the video surveillance system (CCTV), operating in accordance with applicable law

# 4. Who are the recipients of my personal data?

The staff of FHL Kyriakidis SA, has access to your personal data, in the course of performing the duties assigned to them by the.

FHL Kyriakidis SA may be required or entitled to disclose your personal data to a number of third parties such as:

- legal and Supervisory Authorities when they are acting within the framework of their competences,
- information systems companies when they provide us with support services in our information systems,

- guarding and security companies,
- third parties if they prove that their legitimate interest is superior to yours,

provided that privacy and confidentiality is always respected.

## 5. How long is my data kept?

H FHL Kyriakidis SA retains your personal data for a period defined by the applicable legal and regulatory framework. More specifically:

- The employee personal data is retained twenty (20) years after retirement from FHL and ten (10) years after the expiration of the contract for any other reason.
- Your resume (CV) is retained for one (1) year after receiving it.
- The video recording is retained for a period of 15 days.
- If your personal data is included in ongoing legal cases, then it is retained until the final adjudication of the case.

# 6. What are cookies and why are they collected by FHL Kyriakidis SA?

In order to make sure our site is working properly, we may sometimes put a small piece of data known as cookie on your computer or mobile device. A cookie is a text file that is stored by a web server on a computer or a mobile device. The content of a cookie can only be retrieved or read by the cookie server. Text in a cookie often consists of identifiers, site names and some numbers and characters. Cookies are unique to browsers or mobile apps you use, and allow sites to store data, such as your preferences.

You can view our Cookies policy

# 7. How is my data protected?

At FHL Kyriakidis SA we work daily to ensure that the personal data we receive:

- Are processed in a legal, fair and transparent manner
- Are collected solely for specific and legitimate purposes
- Are adequate, they are related to the purpose for which we collect them and are limited to what is necessary
- Are accurate and up-to-date
- Are maintained exclusively within the specified timeframe and no longer
- Are processed in a way as to ensure the necessary security of personal data

# 8. My rights as a data subject?

#### Access

You can at any time ask us to inform you and you have access to your personal data that we hold.

#### Correction

You have the right to ask us to correct the data that is inaccurate or incomplete.

#### Erasure

You can ask for your personal data to be deleted.

## Data Portability

You can receive your personal data which you have provided to FHL, in a structured, commonly used and machine-readable format.

## The right to oppose and limit processing

In case you disagree with the way we process your personal data, you can request the interruption or limitation of the processing

## The right to withdraw consent

You have the right to withdraw your consent to process your data at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal

FHL Kyriakidis SA will make every effort to respond to your request without delay and in any case within one month of receiving it. This period is extended for a further two months if it is necessary taking into account the complexity of the request and the number of requests. FLB will inform you of this extension within one month of receipt of the request and of the reasons for the delay. If you have submitted the request by electronic means, the update is provided, if possible, by electronic means, unless you request otherwise.

FHL Kyriakidis SA is in any case entitled to refuse the satisfaction of your request to restrict the processing or deletion of your personal data if such processing is necessary for the foundation, exercise or support of its legitimate rights or the fulfillment of its obligations.

Applications for your rights are made free of charge.

## To exercise your rights *click here*

### 9. Questions about Data Protection

If you have questions about your data protection and your rights, or you believe that they have been violated, please contact the Data Protection Officer (DPO) of FHL Kyriakidis SA at email <a href="mailto:dpo@fhl.gr">dpo@fhl.gr</a> and we will respond to them as soon as possible.

# 10. Αρχή Προστασίας Δεδομένων Προσωπικού Χαρακτήρα

If in your opinion we have not resolved the issues with your personal data, you have the right to file a complaint with the Personal Data Protection Authority (<a href="www.dpa.gr">www.dpa.gr</a>, e-mail: contact@dpa.gr, phone: 210 6475600, Kifisias 1-3, T.K. 115 2, Athens, Greece), which is the

competent supervisory authority for the protection of fundamental rights and freedoms. of individuals in relation to the processing of their personal data.

We encourage you to read our <u>Personal Data Protection Policy</u>