

## Privacy Policy

We strive for transparency and trust when it comes to protecting your privacy and we aim to clearly explain how we collect and process your information. It's important to us that you should enjoy using our products, services and website(s) without compromising your privacy in any way. This privacy policy explains how **Symeon G Tsomokos SA.**, with its registered office at 9 Karneadou St., Athens, Greece, ("SGT" or "we") processes personal data.

We only collect, use, and process your personal information in accordance with actual data protection legislation. This includes but is not limited to Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 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) and applicable national data protection legislation.

Your personal data are usually obtained directly from you. In this case, you provide your personal data on a voluntary basis. Specific cases of non-disclosure of personal data may affect the ability of SGT to properly provide services, or properly perform contractual obligations. SGT acts on behalf of its subscribers and other clients in the capacity of a data controller.

### **FOR WHAT PURPOSES ARE PERSONAL DATA PROCESSED?**

SGT processes your personal data as needed for the following purposes:

- (i) Provision of services – this includes the delivery of digital content (legal basis: processing necessary for contractual performance or for the implementation of measures taken before a contract is concluded);
- (ii) Processing payments – this includes the maintenance of payments, together with payment processors (legal basis: processing necessary for contractual performance);
- (iii) Marketing activities – this includes the delivery of personalized content, targeting of advertising or the sending of newsletters (legal basis: legitimate interest);
- (iv) Determination and enforcement of SGT 's legal claims (legal basis: legitimate interest);
- (v) Compliance with legislation.

If necessary, SGT will ask you for permission to process your personal data.

## **WHAT CATEGORIES OF PERSONAL DATA DO WE PROCESS?**

Using the services provided by SGT may require the following data:

- Name, surname, jobtitle, company and industry;
- Address, telephone number, and email;
- Payment details (payment card information);
- Your preferences and opinions on products and services;
- Your browsing activity on our websites.

## **WHEN DO WE COLLECT DATA?**

All data that we receive is obtained directly or indirectly from you when you choose to use our services. This includes the following situations:

- When you subscribe to our newsletter;
- When you pay for or use our services;
- When you register to our events
- When you browse our website;
- When you share content from our website; or
- When you interact with us via social media platforms.

## **WHO DO WE SHARE PERSONAL DATA WITH**

In order to provide you with the services you request, your personal data may be provided to:

- (i) Selected employees of SGT;
- (ii) Service providers – those ensuring provision of the services provided by SGT, in particular software services providers, marketing providers, customer service providers, and distributors of marketing and other materials such as newsletters, including employees of such entities;
- (iii) Tax advisors, professional advisers (e.g. auditors, lawyers), including employees of such entities;
- (iv) Entities providing payment services;
- (v) Social media providers – using the services of SGT together with a social network may require SGT to share your personal data with social media providers.

## **INFORMATION WE DO NOT TRACK**

We do not track or collect any sensitive information about you. This includes race, religion, ethnicity, and political opinion.

## **HOW LONG ARE YOUR DATA RETAINED?**

We keep your data for the period of time necessary to fulfill the purposes of processing as defined above; however, this data will be erased, when you stop interacting with SGT (i.e. after delivery of a particular service, unless SGT has a legitimate interest in keeping the personal data longer (for example to protect SGT's legal claims). This would be the case if SGT had a legal obligation to keep your data for a longer period of time (for example, based on applicable accounting rules), or in cases where applicable law obliges us to keep such records for a longer period.

## **ARE YOUR PERSONAL DATA SECURED?**

We store electronic and in some cases physical copies of your personal data. In accordance with best practices, we maintain security safeguards that protect your data. We strictly limit who is allowed to access the information and we keep this number to a minimum. In addition, we maintain physical and cyber safeguards, server protection devices, and software to minimize possible loss, misuse, or alteration of your data.

Your personal data may be stored and processed in countries where SGT carries out business or where its service providers are located. These countries may apply different privacy rules than the European Union, or the European Economic Area (EEA). SGT has put in place appropriate contractual and other measures to protect your personal data when personal data are transferred to related parties or third parties located in other countries.

In the case of cross-border transmission of data from the EEA to countries where the European Commission recognizes an insufficient level of protection of personal data, the controller ensures that these data recipients are bound by EU standard contractual clauses to protect your personal data.

## **WHAT ARE YOUR RIGHTS?**

Regarding your data, you have the following rights:

- (i) To request access in order to correct or delete your personal data, as well as to restrict its processing; however, your right to delete or restrict processing is applicable only if SGT is not required to process it on another legal basis (i.e. compliance with a legal obligation);
- (ii) To object to the processing of your personal data processed with a legitimate interest, as well as against processing for marketing purposes.

If you wish to exercise your rights above or have any questions regarding the processing of your personal data, please contact the administrator by email at: [info@tsomokos.gr](mailto:info@tsomokos.gr).

The information that SGT is required to provide to you regarding the processing of your personal data may change over time or become outdated. For this reason, SGT reserves the right to modify and change these conditions at any time. These changes will be reflected in this statement, so you should check here regularly.