

Revisions Table

Revision #	Date	Change description
1	12/3/2021	English translation
2	12/9/2022	Inclusion of GPS data

	Authored by:	Approved by:
Position:	GDPR Manager	General Manager
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1 PURPOSE

The purpose of this Policy is to define and formulate the general framework and basic principles set and applied by ENARXIS DYNAMIC MEDIA LTD (hereinafter the "Company") regarding the processing of personal data and the protection of their security, confidentiality, integrity, and availability.

2 APPLICATION

This Policy applies to all personal data managed by the Company in the context of its activity.

3 PERSONS RESPONSIBLE FOR POLICY IMPLEMENTATION

- Administration
- GDPR manager
- All company staff
- All partners who manage and / or have access to personal data

4 DESCRIPTION

4.1 General

Our Company recognizes and respects the importance of personal data which it handles in the context of its activity, and for this reason has fully adapted its policy to the requirements of the General Data Protection Regulation 2016/679 (hereinafter GDPR).

With this statement our Company wishes:

- to inform in what capacity, for what purpose and on what legal basis the Company processes personal data, ie information that can be used in the direct or indirect identification of individuals
- to identify the categories of data, the data sources (when the data is not provided by the individual themselves) and the criteria for determining the time period of data retention
- to inform about the transfer of personal data to third parties or third countries
- to inform about the possibility of the subjects to contact our Company for any issue regarding the processing of their personal data, the possibility to exercise regarding their personal data the rights of access, correction and, as the case may be, deletion, restriction and processing objection, as well as the ability of individuals to report any breach of their personal data rights to the Personal Data Protection Authority,

- to determine the principles governing the observance of the relevant policies of protection and security of personal data by the Company.

For any question or inquiry, or anyone wishing to receive a copy of this statement or wishing to exercise any of the rights relating to their personal data, the interested party may contact the GDPR Manager of our Company, at phone +302109011900 and email data.protection@enarxis.eu.

4.2 Contact Details of the Controller, their Representative and the GDPR Manager

Data Controller:

Name	Enarxis Dynamic Media Ltd
Address	ILIA ILIOU 68 Street, 4th Floor, 117 44, Neos Kosmos, Athens, Greece
Telephone - Fax	+30 210 9011900 – +30 210 9028700
Email	info@enarxis.eu

GDPR Manager:

Michael Misirlis
ILIA ILIOU 68 Street, 4th Floor,
117 44, Neos Kosmos, Athens,
Greece
+30 210 9011900
data.protection@enarxis.eu

This statement covers the collection of personal data by our Company during the development of its activity, including its presence on third party websites, platforms and applications based on the Terms of Use of our website.

It is noted that during your visit to the Website of our Company, simple data are collected related to your interaction with the website and the installation of cookies (see relevant Cookies Policy). Third party websites generally apply their own privacy statements and their own terms and conditions. We invite you to read them before using these sites.

4.3 How is my personal data collected;

We might collect personal data from various sources, namely:

- Personal data provided to our Company directly by the subjects, for one of the following reasons:
 1. Information you give us during the conclusion, development, and termination of the contractual relationship between us.
 2. Information you give us during your participation in the events of our Company.
 3. Information you give us when you contact us or submit a request.
 4. Information you give us when you subscribe to our Company newsletter.
- We also receive personal information indirectly, in the following cases:
 1. Information we receive during the credit check of our customers, after the proper legal procedure has been followed
 2. Data that we collect during the operation of closed-circuit video surveillance (CCTV) in the premises of our Company.
 3. Data that we collect through GPS for the location of the Company's cars.
- We also receive and store specific types of personal data whenever anyone interacts with us online, ie when we use cookies and tracking technologies to receive personal data and also when the web browser used by the internet user has access to our website or our posts, as well as other content displayed by the Company or on its behalf on other websites.

4.4 What personal data is collected?

Personal Data means any information relating to an identified or identifiable individual ("data subject"). An identifiable individual is one whose identity can be ascertained, directly or indirectly, in particular by reference to an identifier such as name, identity card number, position data, online identity, or one or more factors that characterize the physical, physiological, genetic, psychological, economic, cultural or social identity of that individual. Due to the nature of our Company's activities, the Personal Data it collects mainly concerns the following categories of subjects:

- **Company Employees:** ie their personal data and data that refer purely to the employment relationship with our Company, which include identity and communication data, financial data as well as health data of the individual or additional members, related to our Company's compliance with labor and insurance

legislation. Moreover, location data are collected via GPS for the Company's cars, that are used by the Company's employees.

- **Candidate employees to be hired:** ie their personal data and data related to their evaluation as candidates and to the Company's recruitment procedures, which include identity and contact details, as well as details of the professional curriculum vitae of the candidates.
- **Partners of the Company:** (suppliers and other partners): ie their personal data and data that refer to the contractual relationship between us, which include identity and communication data, transaction data as well as financial data related to the Company's compliance to its legal obligations.
- **Customers, prospective customers and generally people who communicate with our Company:** ie their personal data and information that refer to the contractual relationship between us, where it exists, or that are used to communicate with the Company which include identity and contact information, transaction data as well as financial data related to the compliance of our Company with its legal contractual obligations.
- **Newsletter recipients:** ie personal data of the persons that are consensually provided by them to our Company for our communication with them for informational and direct marketing purposes of products and services, which indicatively include identity and contact details, and details of the Company's previous transaction relationship with them (if the recipient is or has been the recipient of our Company).

Furthermore, Personal Data may be collected for individuals entering the Company and its facilities during the operation of CCTV, for reasons of security of persons and goods.

We do not collect personal data of special categories, other than the health data referred to herein, such as personal data relating to race, ethnicity, religion, sexual orientation or genetic biometric data, etc., which are categorized as special data categories and receive additional protection in accordance with European data protection legislation.

4.5 For what purposes is my data used?

The purpose of the processing depends on the function performed.

- The personal data of the employees are provided to our Company for the purpose of concluding, executing or terminating the respective employment and/or cooperation contract. Also, the personal data of the employees regarding absences, hours of presence, leave, and medical documents of sick leave, are kept for the purpose of granting leave, including sick leave, while the personal data concerning the performance of the employees are provided by the heads of departments for the purpose of staff evaluation by the Company.
- The personal data of the candidate employees, which they themselves provide during the individual stages of selection and evaluation, are disclosed to the respective Department of the Company and to the Management, for the purpose of informing the Company, employee evaluation, interviews, etc. for the recruitment of employees and the conclusion of cooperation.
- The personal data of the associates, customers and generally traders with the Company, which they themselves provide to our Company, are collected and processed for the purpose of concluding and developing the contractual relationship between us, when it exists, for our compliance with our lawful contractual obligations, and on a case-by-case basis for our communication with them upon their request.
- The personal data of the newsletter recipients are collected with their consent and are used for our communication with them for informational purposes and direct commercial promotion of products and services.
- The Company entrance as well as the rest of the facilities are monitored with CCTV cameras. Any individual entering the building facilities (employee or visitor) is informed in an appropriate, obvious, and understandable way (signs) about their entry into a CCTV area for reasons of safety and protection of persons, goods and critical infrastructure and other elements according to law.

4.6 What is the legal basis of the processing?

The collection and processing of personal data of the above subjects is based either on the preparation and execution of a contract, or on an obligation of the Company to comply with its legal obligations (as an employer in employment contracts but also in relation to its general legal obligations), or to service the company's legitimate interests (security of persons, goods and infrastructure, productivity optimization). In cases where the legal basis is based on consent (such as in the case of sending a newsletter via e-mail), the subject is explicitly informed and reserves the right to revoke it, easily and at any time.

4.7 Profile creation

The Company does not use personal data to create profiles.

4.8 Data Transfer to Third Parties: Who will my data be shared with?

The Company generally does not disclose the data to third parties, except in the following cases.

- The Company shares personal data of its employees, customers, and associates to an external accountant associate, with whom it has signed a contract.
- The relevant medical data of the employees are shares with the physician of the Company, with whom a contract has been signed.

4.9 How long is my personal data kept?

The retention time of personal data depends primarily on the purpose of the processing, and their mere storage constitutes an act of processing, which is permitted only if it is governed by the relevant processing rules. After the retention period, personal data are deleted.

- The personal data of the prospective employees are kept electronically in a mailserver and a fileserver. The HR department and the Company's Management has access to them for a period of two years from the completion of the employee selection-recruitment process. The retention is due to a possible re-evaluation of the candidates by the Company.
- The personal data of the employees, ie those who have already drawn up an employment contract with the Company are kept in a physical file and in a fileserver by the H.R. department, in principle, for as long as the employment relationship lasts. After the termination of the employment relationship, for any reason, the relevant data are kept for a maximum of twenty years (indicative limitation period of any resulting legal claims), a period during which any legal case of their processing may arise, such as case of civil cases or investigation of a criminal act where it is possible that an employee is involved, case of tax control, etc. The above also applies to data related to corporate assets provided to employees, access to electronic and physical files and to work fields and corporate mobile phones, for the purpose of executing the employment contract. They also apply to personal data

relating to the granting of leave to employees (absences, hours of attendance, leave, medical leave of sick leave) and staff appraisal.

- The personal data of the customers and partners of our Company are kept in a physical file and in a fileservers by the H.R. department , in principle, for as long as the contractual relationship between us lasts. After the termination of the contractual relationship, for any reason, the relevant data are kept for a maximum of twenty years (indicative limitation period of any resulting legal claims), a period during which any legal case of their processing may arise, such as case of civil cases or investigation of a criminal act, case of tax audit, etc.
- Personal data of employees and visitors from a CCTV system operating in our premises, including the entrance and selected workplaces, are kept for fourteen (14) days on a CCTV recorder, without prejudice to more specific provisions of the legislation applicable to specific categories of controllers. In case of an event concerning the purpose of the processing, the controller is allowed to keep the data, in which the specific event has been recorded, in a separate file for three (3) months. In the event that during this period we find an incident, we isolate part of the video and keep it for up to four (4) more months, in order to investigate the incident and initiate legal proceedings to defend our legal interests, while if the incident concerns a third party we will keep the video for up to five (5) more months.

4.10 What are my rights?

The processing of your personal data is also linked to your respective rights, which, subject to provisions that may restrict the exercise of these, are:

- Right to information: You have the right to receive clear, transparent, and comprehensible information about how we use your personal data and what your rights are. For this purpose, we provide you with the information in this document and we urge you to contact us for any clarifications.
- The right of access: You can request that we provide you with a copy of your personal data.
- The right to rectification: You can ask us to correct or supplement your data if it is incomplete or contains inaccuracies
- The right to Data portability: You may request that we provide or transfer to a third-party provider, in electronic format, specific information that you have provided to us.

- The right to erasure. In some cases, you can request the deletion of all or part of your data (if, for example, the data is no longer needed for the purposes for which it was collected, etc.).
- The right to restriction of processing. You have the right to restrict the processing of your personal data.
- The right to withdraw consent. If you have given your consent to the processing of your personal data, you have the right to withdraw your consent at any time by contacting us at the information provided herein.
- The right to object: you may object to the processing of your data which is carried out in the pursuit of our legitimate interests, as mentioned above.
- The right to file a complaint to the Hellenic Data Protection Authority. You have the right to complain directly to your local supervisory authority, the Hellenic Data Protection Authority, about how we process your personal data.
- Rights related to automated decision making. You have the right not to be subject to a decision based solely on automated processing that has legal or other significant consequences for you. Specifically, you have the right to:
 - to ask human intervention,
 - to express your opinion,
 - receive explanations for the decision that emerged after an evaluation,
 - challenge this decision.

In case of exercise of any of the above rights, we will take every possible measure to satisfy your request within a reasonable time and no later than (1) month from the identification of your submitted request, informing you in writing of the satisfaction of your request, or the reasons that may prevent the exercise of the relevant right, or the satisfaction of one or more of your rights, in accordance with the General Data Protection Regulation. Please note that in some cases the satisfaction of your relevant requests may not be possible, such as when the satisfaction of the right is contrary to a legal obligation or conflicts with a legal basis for the processing of your data.

However, if you consider that any of your rights or legal obligations of our Company regarding the protection of Personal Data are violated and after you have previously addressed the Company for the relevant issue, meaning you have exercised your rights towards the Company and either you did not receive a response within a month (extension of the deadline to two months in case of a complex request), or you consider that the

response you received from the Company is not satisfactory and your issue has not been resolved, you can file a complaint to the competent supervisory authority at the Hellenic Data Protection Authority (DPA), 1-3 Kifissias Ave., PC 115 23 Athens, email: complaints@dpa.gr, fax 2106475628.

4.11 How is my personal data protected;

We have taken appropriate organizational and technical measures to protect your personal data from misuse, tampering, loss, unauthorized access, modification, or disclosure. The measures we use include the implementation of appropriate measures in access control, technical security of information as well as ensuring that personal data is encrypted, pseudonymized and made anonymous, where necessary and feasible.

Access to your personal data is allowed only to our competent employees and associates and only if it is necessary to support the activity of our Company, and is subject to strict contractual obligations of confidentiality, when assigned and processed by third parties.

4.12 How can I contact the Company?

You can contact us at the address of our headquarters, Elias Iliou street no. 68, PC 11744, Athens, Greece or at the e-mail address info@enarxis.eu or submit a request through the Contact form on our website.

4.13 Update of this Privacy Statement

This document will be revised if necessary, to adapt to legislative changes, to respond to the comments and needs of personal data subjects, and to changes in our Company's products, services, and internal procedures. Each change will be published with a simultaneous revision of the last update date at the top of this document.