GRIVALIA MANAGEMENT COMPANY

PRIVACY POLICY

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Scope of the Privacy Policy

This Privacy Policy provides information on how our Company processes personal data each time you visit our premises or website. Our Company respects your privacy and, in accordance to the national and union legal framework on personal data protection, especially the general Data Protection regulation (EU 679/2016), publishes the present lawful, fair and transparent Privacy Policy, in order to provide sufficient information to the natural persons ("data subjects") on the personal data it collects and further processes in the context of provisions of its services to the public.

The Company's full details are:

GRIVALIA MANAGEMENT COMPANY Société Anonyme

Address: 117, Kifissias Avenue & Agiou Konstantinou
Marousi, P.C. 151 24, Athens

Phone Nr.: +30 210 8129600

Email: grivalia@grivalia.com

Definitions

For the purposes of this Policy, the following definitions should apply:

'Personal data': any information relating to an identified or identifiable natural person ('**data subject'**); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

'Special categories of personal data': personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation;

'Processing': any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording,

organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

'Anonymization': the processing of personal data in such a way that data can no longer be attributed to a particular data subject;

'Pseudonymization': the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;

'Controller': the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

'Processor': a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

'**Consent**': of the data subject: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

'**Personal data breach'**: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;

'Existing legislation': The provisions of the existing Greek, EU or other legislation which is applicable to the Company and regulate matters of data protection and privacy, such as Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 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-GDPR) and any implementing laws.

Personal Data Collected and Means of Collection

The Company, in the context of its operations and services, may collect personal data relating to its customers, its employees and partners in general, as well as of other natural persons with which the Company cooperates.

The Company may collect information that consists personal data in the following cases:

A. Data collected through the website (www.grivalia.com)

A.1. Data collected through the communication form

When you choose to contact us through the electronic communication form available in the Company's Official website, we will ask you to provide certain information, such as your name, surname, e-mail address, while at the same time, you may fill in other contact details, such as address, telephone number, mobile phone number, fax, as well as any further information you include in the entry "Comments".

A.1.2. Purposes of processing – Legal basis:

We collect the information you will provide through the communication form with the sole purpose of serving and contacting you in order to satisfy your request. The legal basis of processing is the Company's legitimate interest.

A.2. Data collected through the section "Career Opportunities"

In case you are interested in applying for a job opening, either by responding to a vacancy notice published on our website, or by submitting a spontaneous application, we will collect the following details: name, surname, email address, CV, as well as any further information concerning you that you may voluntarily submit. These details are submitted by the applicants themselves through their CV, either directly to the Company (via e-mail), or through partner companies, which carry out the collection of CVs for certain job vacancies on behalf of the Company.

A.2.2. Purposes of processing – Legal basis:

We will use the details submitted along with your job application only for evaluation purposes in relation to a position or (in case of a spontaneous application) in relation to possible new

positions that could match your CV. We will use your contact details in order to contact you regarding the progress of the evaluation process.

We do not share the details you provide with any third parties, outside the Company, and we handle the information you submit with strict confidentiality. The legal basis of processing your data is the Company's legitimate interest.

A.3. Online Technologies

In addition, we may collect only certain necessary information relevant to the visits of the concerned website, as for example the Internet Protocol address (IP address), the type of the web browser operated by the user and cookies. For more information regarding the use of cookies in the present website, please refer to our Company's Cookies Policy.

B. Data collected by the Company in the context of its activities and operations

B.1. Employee data:

The Company maintains employee records with all the details needed during the hiring process, payroll and management of the employment relationship, such us the name, surname, mother's name, father's name, year of birth, ID number, place of birth, sex, nationality, marital status, residence address, Tax Identification Number, professional experience, education certificates, recruitment date, working position, working schedule, working permit (when required for foreign employees), Social security number, IBAN or/and credit or debit card details, arrival and departure details, details of possible employee benefits (e.g. business cars, business credit cards and loans), details of employee trainings, evaluations etc.. These data are collected directly from the employees. In addition, it's possible that these data do not always belong to employees but to third parties (e.g. employee family members, children, etc., as protected family members). Furthermore, we may collect employee data through the Company's internal complaints system.

B.1.2. Purposes of processing – legal basis:

The Company collects and processes employee details in the framework of the employment relationship, both in performance of the contractual relationship, as well as during the pre-contractual stage. At the same time, the processing of employee data is in certain cases

necessary, for us to comply with our legal obligations as employers (e.g. tax and social security liabilities).

B.2.1. Supplier and Partner data:

Regarding our suppliers and partners (in the case of natural persons or sole proprietors) we collect details as name, surname, Tax Identification Number, address, telephone number, IBAN account details, Tax authority details. These data are collected directly by our suppliers and partners.

B.2.2. Purposes of processing – legal basis:

We use the data collected by our suppliers and partners in the context of fulfilling our contractual relationship, as well as to respond to tax legislation requirements.

B.3.1. Real estate owners/tenants, participants in real estate selling and purchasing through tendering and bidding:

In the context of handling real estate selling and purchasing procedures, we collect details (in cases of natural persons or sole proprietors) such as name, surname, Tax Identification Number, address, etc. We collect those details either directly by data subjects or through our partner agents.

B.3.2. Purposes of processing – legal basis:

The collection and processing of the above details is performed in the context of managing the contractual relationship (selling and purchasing, leasing etc.) and complying with our legal obligations (e.g. tax legislation).

B.4.1. Data of visitors at our premises:

When someone visits our premises, we may collect image data as well as name, surname, entrance and exit time and ID card number.

B.4.2. Purposes of processing – legal basis:

We collect those data directly from the data subjects to ensure the Company's legitimate interests and particularly, the safety of persons and goods.

B) "Special categories of personal data" (sensitive personal data):

In certain cases, the Company may collect and process data that consist special categories of personal data (i.e. sensitive personal data), in order to comply with its legal obligations.

Particularly, the Company may process data concerning an individual's health state (such as medical certificates for granting sick leaves). Processing of those data is necessary for the Company to comply with its obligations and for both the employee and the Company to exercise their rights in the field of labor law and social security law, if provided by the national and union law (art.9 par.2b GDPR).

Minors' Data

Requesting or receiving minors' personal data is not a part of the Company's Policy (i.e. from individuals that have not reached the age of 18 years old), either directly or indirectly through third parties, further than the data concerning children, as protected and dependent members of insured parents.

However, given that it is impossible to always control the age of individuals entering or using the websites of the Company, parents and legal guardians are advised to contact directly the Company in case they observe any unauthorized disclosure of data on behalf of the minors for whom they are responsible, in order to exercise their rights accordingly, as e.g. the erasure of their data.

Disclaimer for third-party websites

The Company's website may include links, which redirect to third-parties' websites. The Company does not control those websites and is not responsible for the content posted on them or any further links appearing on them. The Company is not responsible for third-parties' privacy practices or for their websites' content.

Transfer of personal data

The Company may transfer personal data to third parties (legal entities or individuals) when provided by existing law as an obligation, or, alternatively pursuant to the guarantees set by

the existing legislation. More specifically, in the context of pursuance of the processing purposes, personal data may be transferred to:

- Third companies which provide relevant services to the Company, such as banks, insurance companies, social media service providers, etc. In any case, all these companies are contractually bound with the Company in order to ensure the observance of confidentiality, as well as of all obligations provided in the legislation on data protection.
- Public authorities and supervisory authorities (Police, prosecuting authorities, Athens Stock Exchange, Hellenic Capital Market Commission, etc.).

Where the transfer of data concerns a country outside the European Union (EU) or the European Economic Area (EEA), the Company shall always check whether:

• The Commission has issued an adequacy decision on the third country to which the transfer is addressed to.

• Appropriate safeguards are in place in accordance with the Regulation for the transfer of such data.

In any other case, the transfer to a third country is not allowed and the Company may not transfer personal data unless any of the specific derogations provided for in the Regulation apply (e.g. explicit consent of the data subject, upon informing him/her on the risks of the transfer, the transfer is necessary for the performance of a contract at the request of the subject, there are reasons of public interest, it is necessary to support the legal claims and the vital interests of the subject etc.).

Data privacy and security

The Company takes all appropriate measures to prevent unauthorized access to data subjects' data, as well as to maintain their accuracy and ensure their appropriate use. However, it is noted that no electronic data transfer or storage method is 100% secure. Nevertheless, the Company takes all necessary security measures (*antivirus, firewall*).

In cases where the Company maintains originals/ copies of documents containing personal data in hard files, it takes all appropriate measures to ensure their protection, not only from unauthorized access (e.g. locks, alarms, transfer of documents in sealed envelopes, data

classification etc.), but also from damages or destruction (e.g. fire protection systems, use of cabinets non accessible in case of flood).

Data Subjects' rights

The Company shall take appropriate measures to ensure that data subjects can exercise their rights, as provided by national and Union legislation regarding the collection and processing of personal data concerning them. It is noted that all data subjects can exercise, at any time, their rights in relation to the processing of their data, as defined in the regulation. More specifically, each data subject has the following rights:

- To request to be informed on the personal data kept by the Company.
- To request access on his/her personal data. The data subject can ask to receive a copy of his/her personal data maintained and examine the lawfulness of processing.
- To request the correction of his/her personal data. The data subject may request to confirm the accuracy of his/her data and, if found inaccurate, to correct them.
- To request the deletion of personal information provided. The data subject can ask to have his/her personal data deleted or retracted, unless prohibited by legitimate reasons or by law.
- To request for limitation of processing.
- To request for portability of his/her personal information. The data subject has the right to receive his/her personal data in a structured, commonly used and machine-readable format (pdf, word, etc.).
- In cases where the processing is based solely on the data subject's prior consent, he/she has the right to withdraw his/her consent at any time. Withdrawal of consent does not affect the lawfulness of processing performed based on consent before its withdrawal.

To exercise any of the above rights, you can contact the Compliance Director by email at grivalia@grivalia.com or by phone at: +30 210 8129600.

The Company provides the data subject with information on the processing operations within one (1) month from the submission of the data subject's relevant request and following the data subject's identification.

Data subjects have the right lodge a complaint with the Hellenic Data Protection Authority (DPA) for issues concerning the processing of their personal data. For the Authority's

competence and the means of filing a complaint, detailed information is provided on the website of the DPA: www.dpa.gr .

Data retention period

All personal data collected and processed by the Company are retained for a pre-determined and specified period of time, depending of the purpose of processing. When this time period expires, the personal data are safely deleted and/or destroyed, unless their further retention is permitted or required by law.

Updates to the Privacy Policy

The Company may revise this Privacy Policy from time to time for compliance reasons or to meet its operational needs and legal obligations. Updated versions will be uploaded to our website, with data reference, so that you are always aware of when our Privacy Policy was last updated.

Revised Date: May 2020