

InTTrust S.A.

Personal Data Protection Policy

The protection of personal data is important for InTTrust.

The current Personal Data Protection Policy (hereinafter referred to as "Policy"), describes the way in which the company InTTrust S.A., based in Agia Paraskevi, Mesogeion 350, ZIP Code 153 41, tel. +30 2106513040, email: info@inttrust.gr (hereinafter referred to as "InTTrust S.A." or "we" or "us"), acting as Data Processor, collects, stores, uses and generally processes the personal data (hereinafter referred to as "Data"), which is submitted during the use of the website www.inttrust.gr or in the conclusion and execution of a contract with us.

For any issue related to the processing of Data, you may contact us via:

- email: info@inttrust.gr (Attn: Data Protection Officer)
- letter: Mesogeion 350, Agia Paraskevi, ZIP Code 153 41 – Greece (Attn: Data Protection Officer)

1. A few words about InTTrust S.A.

InTTrust S.A. is a company that provides turnkey IT services as well as IT and telecommunication product sales services. In more detail, we offer:

- Design, Development, Installation, Configuration, Administration, Support and Project Management Services for IT and Telecommunications systems (H/W & S/W)
- Integration Services for heterogeneous IT and Telecommunications systems (H/W & S/W)
- Outsourcing Services for IT and Telecommunications systems

2. What is personal data?

'Personal Data' means 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.

Such data may be (indicatively): First Name, Last Name, Father's Name, ID Number, Tax ID, Tax Authority, Social Security member registration number, Social Security Number, Postal Address, Email address, Landline or Mobile Phone Number, Education performance data, Certification results, Bank Account Number, etc.

3. What is Personal Data Processing?

'Processing' means 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, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

4. What Data do we collect?

We in InTTrust S.A. take care to collect only the bare minimum of required Data that we need for our purposes.

More specifically, we collect the following:

- Contact details (landline or mobile phone, email, contact address, zip code)
- Tax identifiers (tax ID, Social Security member registration number, OAED (Labour Employment Office) card)
- Identity data (First and Last Name, Father's Name, Mother's Name, ID number, passport number)
- Financial Data (bank account information, IBAN)
- Data pertaining to professional specialty (position, prior occupation, qualifications, professional certifications, CV)

5. Why do we process the data?

InTTrust S.A. collects Data for the following processing purposes, either within the framework of the Agreement between us, or, subject to explicit

and specific consent, per provided service of the Company and service in general. More specifically, we use the Data for the following purposes:

- for the conclusion of an employment or cooperation contract, at the request of the interested party within the framework of the services provided
- for the issuance of inspection, control, certification, and training documents
- for compliance with the requirements of the rules of recognition, accreditation, or inclusion in schemes by the relevant Recognition or Accreditation Bodies or abroad including the sending of data to the Competent Authorities and / or other Control Bodies
- for the issuance of service documents for the services provided by InTTrust S.A.
- for information on services, events, products, and news from InTTrust S.A.
- to meet its legislative, regulatory, and fiscal obligations
- for the submission of a CV

6. What is the legal basis for Data processing by InTTrust S.A.?

Data is collected in accordance with the legal bases provided by GDPR (Articles 6 and 9)

- after consent of the data subjects
- for compliance with legal obligations to which InTTrust S.A. is subject
- for the purposes of the legitimate interests pursued by InTTrust S.A.
- for the conclusion or execution of a contract

7. Who are the Data recipients?

Recipients of the Data are our clients, representative and/or subcontractors, in order to support, promote and execute our transactional relationship. As a rule, InTTrust S.A. does not transmit the Data to third parties, except when expressly required by the Legislation / Regulatory Framework, or when acting as an "intermediary". The above transmission takes place to the extent required for the provision of our services. Such third parties may be official Supervisory / Governmental Bodies, or when we are called upon to comply with legislation / labor / education regulations and/or to prevent illegal actions against us and our Clients (e.g., fraud, insult, etc.).

Additionally, access to the Data is given to the strictly necessary staff of InTTrust S.A., which is bound by a confidentiality agreement.

8. How do we ensure that our partners/representatives/subcontractors respect the Data?

Our partners/representatives/subcontractors have agreed and are contractually bound to:

- preserve confidentiality and to bind their staff to their respective obligations
- not transfer the Data to any third parties without our written permission
- take organizational and technical Data security measures
- notify us of any incidents involving Data breach
- delete and/or return to us the Data upon expiration of our contract and
- comply with the legal framework for the protection of personal Data and specifically the General Data Protection Regulation (GDPR)

9. Do we send the Data outside of the EU?

InTTrust S.A. imposes contractual restrictions on its partners, who ensure that they will comply with the applicable national and European personal data regulation. As part of our services, we may need to transfer information to other countries [generally within and in exceptional cases outside the European Economic Area (EEA)], on the basis of EU competence rulings, Privacy Shield certification, binding corporate rules, standard contracts and approved codes of conduct.

10. How long do we retain the Data and when do we delete it?

We retain the Data for as long as is required to fulfill the purpose for which we collected it unless an extension of time is required due to our legal claims or legal obligations. In the event of termination of the contract for any reason, InTTrust S.A. will retain the Personal Data based on the data retention policy of the company, according to the nature of the data and the purpose of processing, in conjunction with the current legislation for IT companies, but also the general labor, tax and other legislation and regulatory framework, based on the processing purpose.

Data collected by the Cookies is deleted in accordance with our Cookies Policy.

11. **Is the Data safe?**

The processing of the Data in any way is only permitted to persons authorized by us, our employees and associates, exclusively for the aforementioned purposes.

We have taken the necessary and appropriate organizational and technical measures for the security and protection of the Data from any form of intentional, accidental, or illegitimate processing, access, alteration, copying or destruction, both at a physical level and a logical security level (indicatively: physical security procedures, classified data access, computer systems protection, software).

These measures and procedures – which are described in detail in the SECURITY POLICY, part of the InTTrust ISO 27001 certification – are revised and amended periodically and/or urgently, when it is deemed necessary.

12. **What are the rights of the Data Subjects?**

The Data Subjects have the following rights:

- **access** to the personal data
- **correction** of inaccurate personal data
- **deletion/right to be forgotten**
- **portability** of the data
- **restriction of processing**
- **objection/withdrawal of consent** to the processing of the Data

13. **How are the rights exercised?**

The rights are exercised by filling in and submitting the standard forms that can be found on the company site. Additionally, by contacting the company's Data Protection Officer via email to info@inttrust.gr or by mail to the address of the company: InTTrust S.A., Ipeirou 2, Agia Paraskevi, Zip Code: 153 41, Greece (Attn: Data Protection Officer).

14. **When do we respond to Requests?**

We respond to Requests for free without delay and in any case within one (1) month from the receipt of the request. If, however, the request is complex or there is a large number of incoming requests, we will notify within the month if it is necessary for us to receive a time extension of an additional two (2) months, within which we will respond.

If the Requests are obviously unfounded or excessive, particularly due to their recurring nature, InTTrust S.A. may impose a reasonable fee, taking into account the administrative costs of providing information or performing the requested actions. Alternatively, InTTrust S.A. may refuse to follow up on the Request, explaining the reasons for the refusal in the response.

In case you do not receive a response within the above deadline, the response you receive is not satisfactory, or the issue has not been resolved, you may contact the Hellenic Data Protection Authority (www.dpa.gr).

15. How can you track the progress of the Requests?

For additional information, you may send an email to info@inttrust.gr (Attn: Data Protection Officer) and we will respond as soon as possible.

16. Links to third party websites

The website of InTTrust S.A. (www.inttrust.gr) may contain links that lead to the websites of third parties, e.g., Accreditation Bodies, which are operated exclusively by them, as well as social media websites of the company. As such, InTTrust S.A. bears no responsibility for the content, actions, or policies of said websites. We urge you to read the data protection policies of the websites that you visit carefully.

17. Do we use automated decision making / including profiling when processing Data?

We do not make any decisions, nor do we profile users based on either automated or manual Data processing.

18. What is the applicable law governing Data processing by us?

The applicable Law is the Greek Law, as shaped according to the General Data Protection Regulation 2016/679/EU, Law 4624/2019, and generally the current national and European legislative and regulatory framework for the protection of personal data. The competent courts for any disputes related to the Data are the Courts of Athens.

19. Who can you contact to verify that your rights have been respected?

You have the right to file a complaint with the Hellenic Data Protection Authority (www.dpa.gr) if you believe that the processing of your Personal Data violates the current national and regulatory legal framework governing the protection of personal data.

20. How will you be notified of any modifications to the present Policy?

We may revise or update the present Personal Data Protection Policy from time to time and in any case, whenever necessary. Any changes to the present Personal Data Protection Policy take effect upon the publication of the revised Personal Data Protection Policy. We update the present Policy whenever necessary. If there are any significant changes to the Policy or in the way that the Personal Data is used, we will publish the updated version of the Policy on our website (www.intrust.gr) before the changes come into effect and we will notify in any appropriate way. We encourage you to read this Policy regularly to learn how the Data is protected.

For InTTrust S.A.