

DATA PROTECTION

**TOOLKITS**

GDPR COMPLIANCE PLAN

**CUSTOMER PRIVACY  
POLICY (WEBSITE)**



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## Introduction

The GDPR is mandatory from 25/5/2018 onwards in all EU countries. All private companies and public bodies are obliged to comply with it.

Under the Accountability principle, legal entities are required to demonstrate their compliance with the requirements of the GDPR. In order for the legal entities to facilitate the fulfillment of this obligation, they organize Data Management Systems.

## Reminder

Illegal management of personal data may result in:

- the imposition of heavy administrative fines
- criminal sanctions
- causing material or moral damage to natural persons (and consequently the obligation to pay compensation)
- damaging the reputation of your business.

## Disclaimer

The documents provided by Trust Pl@n were created on the basis of general and acceptable practices and processing conditions for SMEs and on the level of legal and technical knowledge available at the time of delivery.

In any case the following apply:

- a) The documents provided are subject to the approval of the company based on the particular business mode of operation and may require individual modifications. The services provided therefore contribute to a large extent, but do not result in the full and complete compliance of the second contractor with the obligations arising from the GDPR and related legislation.
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In any case, the use of this is granted to the company and the direct or indirect, temporary or permanent reproduction is allowed in whole or in part, for internal use in the company, exclusively for the purpose of its compliance with the GDPR, to prove its compliance with the principle of accountability and for any purpose closely related to the above.

The parts of the document that may need to be published (eg posted on a website) in order to fulfill the obligation of informing data subjects (eg Privacy Policy) or sent to specific categories of subjects to be informed (eg Data Security Policy, Privacy Notice, Informing employees about cameras), are excluded from the prohibition of dissemination, without prejudice to intellectual property.

## Specifically about Customer Privacy Policy (for businesses that have a website)

If the company has a website then you should post a more specialized Customer Privacy Policy on it, which will include the additional data processing that you perform through the website.

### **What is the document you have in your hands?**

Privacy Policy is a self-commitment document, through which you declare (and commit to) how you process the personal data you collect in regards data subjects, individuals. In this way you meet the principles of information, transparency and accountability. Privacy Policy contains data processing rules, which must be followed by your business and, at the same time, constitute a special "contract" with the subjects, whose data you process.

Privacy Policy can and should be amended when changes occur in the processing of personal data for any reason. These changes to Privacy Policy must be made known to the subjects concerned.

In case the data processing you perform differs from the one stated in Privacy Policy, make the appropriate changes.

### **Instructions for use - application**

In case your business has a website and does not have a Customer Privacy Policy (website version) or has a Customer Privacy Policy (website version) that is not up to date you should follow the steps listed:

- 1) You must complete this Customer Privacy Policy (website version) with the required information.
- 2) You should check the document of the Customer Privacy Policy (website version) for any required adjustments to the specific processes or needs of your business and proceed to the appropriate additions and / or modifications if necessary.
- 3) Then, in order to be valid, it must be signed by the legal representative of the company. The signature is placed at the end of the document that is to be posted.
- 4) In case the company is managed by a collective management body and / or has different procedures, the approval and acceptance of the Privacy Policy is done by the competent body. The aim is to ensure formal and substantive legitimacy.
- 5) After signing, it must be posted on the business website and be available and easily accessible to customers / visitors of the website.

# CUSTOMER PRIVACY POLICY

## **Introduction**

This document, called Privacy Policy, explains in simple terms how we process the personal data that we collect from you or that you voluntarily provide to us in the context of your transactions or communication with our business.

## **Controller**

Responsible for the processing of personal data (data controller) is the company with the following details:

**NAME**

**ADDRESS**

**VAT NUMBER**

**TELEPHONE NUMBER**

**E-MAIL**

and which is legally represented.

Our priority is the legal processing of these data and your complete and transparent information about it. If you have any question, do not hesitate to contact us.

## Privacy Policy Contents

- **First Section: General Information**
  - 1) What is personal data?
  - 2) What is Personal Data Processing?
  - 3) Is the processing of your personal data mandatory?
  - 4) When and how do we collect your data?
  - 5) What principles do we follow when processing data?
  
- **Second Section: Analysis of processing**
  - A. Categories of personal data that we process
  - B. Purposes of processing - Legal bases of processing

C. Time-Place of data retention

D. Your rights

- **Third Section: Other information**

## FIRST SECTION: General Information

### 1. What is personal data?

The term "personal data" (hereinafter referred to as personal data or data) refers to any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one whose identity can be verified, directly or indirectly, in particular by reference to an identifier, such as name, identity number, address, telephone number but also by reference to one or more factors that characterize the physical, physiological, genetic, psychological, economic, cultural or social identity of that person or said natural person.

In short, personal data is any information that relates to and concerns a natural person, either they immediately reveal their identity to us or they can reveal it to us.

### 2. What is Personal Data Processing?

Any operation or series of operations performed with or without the use of automated means, on personal data or on personal data sets, such as the collection, registration, organization, structure, storage, adaptation or modification, retrieval, search of information, use, disclosure by transmission, dissemination or any other form of disposal, association or combination, restriction, erasure or destruction.

That is, almost any action, from the moment a piece of data is created to the moment it is destroyed (or fully anonymized), constitutes an act of processing.

The processing of data is a legal act, as long as it is carried out within the framework defined by the relevant legislation, ie national law 4624/2019 and the European General Data Protection Regulation (GDPR) 679/2016 / EU.

### 3. Is the processing of your personal data mandatory?

The provision of some of your data to our company is necessary when you make transactions or contact us.

With this policy we inform you about the processing rules we follow.

If you do not provide us with the data mentioned below, we will probably not be able to complete the transactions you request and generally provide you with our products and services or respond to your contact request or any other request.

#### 4. When and how do we collect your data?

We collect your data at the following times:

- A. When you contact us
- B. When you request to receive updates on our news, offers and events electronically, ie by subscribing to the list of accepted newsletters
- C. When you visit our website

#### 5. What principles do we follow when processing data?

In the processing of your data, we accept, adopt and apply the principles of processing under article 5 GDPR, ie your data are:

- (a) processed lawfully and fairly in a transparent manner in relation to the data subject ("**lawfulness, fairness and transparency**");
- (b) collected for specified, explicit and lawful purposes and not further processed in a manner incompatible with those purposes ("**purpose limitation**");
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ("**data minimisation**");
- (d) accurate and, where necessary, updated; all reasonable steps are taken to promptly delete or correct personal data which is inaccurate in relation to the purposes of the processing ("**accuracy**");
- (e) kept in a form which allows the identification of data subjects only for the period required for the purposes of the processing of personal data; ("**storage limitation**");
- (f) processed in a manner that ensures appropriate security of personal data, including its protection against unauthorized or unlawful processing and accidental loss, destruction or damage, using appropriate technical or organizational measures ("**integrity and confidentiality**").

## SECOND SECTION: Analysis of processing

### A. Categories of personal data that we process

Our company collects and then processes (stores, etc.) mainly the following categories of personal data:

- Name, patronymic, date of birth, VAT number, home address / area, telephone number (landline / mobile), email address
- account number / IBAN, credit / debit card number (if applicable), invoicing data (goods / services, value, quantity), purchase history
- browsing data and the Internet Protocol (IP) address of your terminal device while browsing our site

**B. Processing purposes - Legal processing bases**

We collect and process the above categories of data for the *following purposes*:

1. Provision of services, invoicing-credits,
2. Customer service (information about products-services, customer record keeping),
3. Defending legal claims
4. Compliance with legislation (tax etc)
5. Newsletter sending

***Legal processing bases***

We inform you that the processing for the above purposes is done:

- under the legal basis of art.6 par.1 case. b of GDPR 679/2016 / EU (ie processing is necessary for the execution of a contract to which the data subject is a party or to take measures at the request of the data subject before concluding a contract) and
- under the legal basis of art.6 par.1 case. c of GDPR 679/2016 / EU (ie processing is necessary for the compliance with the legal obligation of the controller).

Regarding the newsletter sending, we inform you that this is done only if we have previously provided some services or only if you have voluntarily registered in the newsletter sending list of our company, ie with your consent.

In every newsletter message you receive, we give you the opportunity to stop their sending, by selecting unsubscribe at any time you wish.

The newsletter is sent only for the promotion of similar and relevant products or services of our company.

Your email address will not be shared with third parties.

### **C. Time-Place of data retention**

The processing of data should be limited in time, at a time that is absolutely necessary for the purposes of processing.

The personal data that we process according to the above, are kept for a period of time that is necessary for the compliance with the legislation (mainly tax) but also for the preservation of our legal claims.

In case of using a credit / debit card, we do not save their data (card number-cvv number), while in case of telephone transaction we delete them immediately after its completion.

Your data are stored on the premises of our company in physical or, where appropriate, digital format.

### **D. Your rights**

We process the above data in accordance with the above protection policy and of course we support and ensure the exercise of your rights through a corresponding procedure.

Our response to your requests (whether it concerns the exercise of rights or the submission of complaints) is free of charge without delay, and in any case within (1) one month from the time we receive your request and confirm your identity. However, if your request is complex or a large number of requests are submitted to our company at the same time, we will inform you within this month about whether we need to receive an extension of another (2) two months, within which we will respond to you. The reported times of one (1) plus two (2) months (if required) are the legal ones and provided in the GDPR.

If your requests are manifestly unfounded or excessive, our company may impose a reasonable fee, taking into account the administrative costs of providing the information or performing the requested action, or we may refuse to act on your excessively repeated request.

In particular you have the following:

1. **Right to be informed** about all the above issues and everything else that concerns the processing of your data.
2. **Right of access**, ie the right to receive a copy of the data you have given us.
3. **Right to rectification**, in case some data are or become inaccurate so that we can correct them. The rectification will take place within 7 working days from the date of submission of your written request and confirmation of your identity.

4. **Right to erasure.** This right may be subject to restrictions due to the need to retain certain data due to legal obligations.

5. **Right to restrict processing** when:

(a) the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data;

b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;

c) we no longer need personal data for the aforementioned purposes of processing, but such data are required by you for the establishment, exercise or support of legal claims and in related cases

6. **Right to data portability**, ie the right to receive the personal data concerning you, and which you have provided to us, in a structured, commonly used and machine-readable format, as well as the right to transfer this data to another controller without objection from us.

7. **Right to withdraw your consent** to being sent our newsletter, ie the right to request that you do not receive newsletter messages from our company via e-mail in the future, through the unsubscribe option in any such email you have received.

8. **Right to complain to the Personal Data Protection Authority** (dpa.gr) in case you consider that we are violating the relevant protection legislation regarding your data.

### SECTION THREE: Other information

A. Our company uses modern and up-to-date organizational and technical measures to prevent illegal intrusion, access or dissemination of your personal data.

B. We inform you that we do not proceed to automated individual decision making or profiling.

C. Our website uses cookies to facilitate your connection to it, to collect traffic statistics or for marketing purposes. For more, visit the Cookies Policy.

D. Contact form

Through the contact form you can send us a contact message and receive information about our services. We urge you not to send us messages that contain sensitive information about you or others. In case you send us such a message, we declare that we will delete it immediately and we will not proceed with further processing or reply.

E. Newsletter sending

To subscribe to the list of accepted newsletters of our company, we only ask for your name and email. Your email will be used exclusively to send you information about our news, services and any special offers. We do not sell, concede or disclose your email to third parties. You have the right to revoke your consent at any time by selecting "unsubscribe" in the emails you receive or **by email at**

#### F. Privacy Policy Reviews

Our company reserves the right to modify or periodically revise this Privacy Policy, at its sole discretion. In the event of a change, our company will record the date of modification or revision in the new Privacy Policy and the updated Policy will apply to you from that date. We encourage you to periodically review this Privacy Policy to determine if there are any changes to the way we handle your personal data.

#### G. Communication - Requests - Complaints

If you have questions, comments or complaints about the management or privacy of your personal data, or if you wish to exercise any of your rights, please contact us at the above contact details.

For the submission of a complaint regarding the violation of your personal data you can contact the Personal Data Protection Authority (1-3 Kifissias Av., PC 115 23, Athens, Call Center: 210 6475600, Fax: 210 6475628, e- mail for notification of an incident of personal data violation: [databreach@dpa.gr](mailto:databreach@dpa.gr) , general e-mail: [contact@dpa.gr](mailto:contact@dpa.gr)

For and behalf of the company

**SIGNATURE**

**DATE**