



**STATEMENT ON THE PROCESSING OF PERSONAL DATA OF CUSTOMERS,
ASSOCIATES & SUPPLIERS**

Data Controller details:

Name: NEW CUST S.A.
Seat: Koropi
Management phone no: 2109656388

Thank you for entrusting the company «NEW CUST S.A.» (hereinafter «the Company») with the processing of your personal data.

In accordance with the «General Data Protection Regulation» [EU] 2016/679 (GDPR) (hereinafter «the Regulation»), we hereby inform you of the processing of personal data of customers, associates and suppliers, carried out by the Company.

1. Object

During the process leading to the selection of associates and suppliers, but also during/in the context of its cooperation with its customers, associates and suppliers, the Company collects personal data of these same persons or their legal or authorized representatives, employees, any subcontractors, contact persons and agents in general; it also collects personal data of natural persons who gain access and/or provide work/services at the Company's facilities.

This statement describes our practices regarding the processing of personal data of the above persons.

Processing means the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, communication by transmission, dissemination or any other form of disclosure, association or combination, restriction or erasure or destruction of personal data of the natural persons.

The Company reserves the right to modify and update this statement, whenever this is deemed necessary, while the respective changes take effect from their posting on its website.

In the event that the cooperation of customers, associates or suppliers with the Company is governed by special conditions in relation to the protection of their Personal Data, these conditions shall apply together with the present ones; in the event of a conflict, the special conditions shall prevail.

2. Collected data



In case you belong to any of the above categories, depending on the specific circumstances and the applicable legal provisions, the Company may collect all or some of the following information about you:

Full name

Contact info

Copies of identification documents, T.I.N. and other information related to the fulfillment of tax and other administrative obligations

Bank account details

Details regarding your contractual relationship or cooperation with the Company and your fees

Data submitted in the context of tender procedures and the direct award of contracts to suppliers (e.g. criminal records of natural persons and legal representatives of legal entities, academic degrees/technical education degrees, professional licenses, credit rating).

Information regarding the hours of your presence at the Company and the permits granted to you, when you attend, provide a service or perform work at the Company's premises, either as a customer, associate or supplier of the Company or as an agent of a customer, associate or supplier of the Company.

Health data in case a certification of reliability is required for the provision of the specific services in the context of our cooperation.

Upon entering the premises of the Company, identification information is collected (e.g. ID Card, passport number), as well as the date and time of entry and exit. An entrance card is issued, which you bring along with you when present at our facilities.

Additional information you share with us (e.g. letters of recommendation from third parties).

3. Data collection sources

Your personal data is collected:

From you

There are various ways you may share information with us, including:
Identification details (e.g. ID Card number, passport number and photocopies thereof).

Over the phone.

Via e-mail.

By submitting bid documents in the context of tender procedures and the direct award of contracts, as well as by signing the corresponding contractual documents.

By completing business forms, through the exchange of business cards.



From other sources

We also receive personal data about you from other sources: from third parties, with whom you have worked in the past, from the société anonyme under the name «Banking Information Systems S.A.» (TIRESIAS S.A.) and from public sources (Government Gazette, General Business Registry, Professional guides), where there are public listings regarding your business activity.

Automatically

Personal data is automatically collected upon entering the Company's premises and at times when a closed circuit television (CCTV) is operating.

4. Processing Purposes

The Company collects and processes the personal data mentioned above for the following purposes:

- to fulfill its obligations under the contract and cooperation with you
- to fulfill legal obligations (e.g. based on tax and insurance legislation, public procurement legislation), issue invoices and receipts
- to protect its property (facilities, infrastructure, equipment) and legitimate interests.

The Company collects and processes the personal data of its customers, associates and suppliers for the aforementioned purposes only and to the extent that is absolutely necessary to effectively serve these purposes. Each time, these data shall be relevant, useful and no more than what is required under the applicable legislation, in view of the above purposes; furthermore, they are accurate and, whenever necessary, updated.

5. Legal basis

For each processing act carried out by the Company, there must be at least one of the following legal bases.

- The processing is necessary for the performance of the Company's contractual obligations towards its customers, associates and suppliers (article 6 paragraph 1 (b) of the General Data Protection Regulation - GDPR)
- The processing is necessary for the Company's compliance with a legal obligation, deriving from the applicable legislative framework of its operation (Article 6 paragraph 1(c) GDPR)
- The processing is necessary to serve the Company's legitimate interests (Article 6 paragraph 1(f) GDPR), which may indicatively occur in the following cases:
- to protect the Company's property and document, secure and establish, exercise or support its legal claims in or out of court;



- to improve the quality of the Company's collaborations and the services provided and its seamless and effective communication with its associates;
- to monitor compliance with the Company's practices and procedures;
- The processing takes place upon your consent through an affirmative action (Article 6 paragraph 1(a) GDPR).

6. Retention period

The Company will retain the personal data of customers, associates and suppliers in accordance with the Personal Data Retention Policy, which has also been made public. In any case, the Company will retain the personal data of its associates and suppliers in accordance with the applicable legislative provisions and only for as long as is required to fulfill the purposes mentioned in sections 4 and 5.

7. Information Security

The Company conducts the personal data processing in a manner that ensures their security. Specifically, it is carried out exclusively by the Company's staff that is authorized for this purpose, while all appropriate organizational and technical measures are taken to protect the personal data of associates and suppliers from accidental or unlawful destruction or loss, alteration, dissemination or unauthorized access.

8. Transmission to Third Parties

The Company does not in any way transmit the personal data of its associates and suppliers or link its record to any third party for financial or other consideration. The Company may provide access to or transmit the personal data of its customers, associates and suppliers to:

Third party service providers on behalf of the Company (lawyers, bailiffs, accountants, auditors, technical and support service providers).

Public Authorities (judicial, tax, audit, police, etc.), when the Company deems that it is obliged to transmit personal data, based on good faith, or in compliance with any enforceable administrative act or order.

9. Under the GDPR, you have the following rights:

Right of access to your personal data (Article 15)

You have the right to access your personal data, which the Company processes, as well as to be provided with information about how it is processed. You also have the right to receive copies of them.

Right to rectification/completion of your personal data in case of inaccuracies/deficiencies (Article 16)

You have the right to ask us to rectify or complete your personal data in case it is inaccurate or incomplete.



Right to erasure of your personal data in specific cases (Article 17)

You have the right to request the erasure of some or all of your personal data, which the Company processes, in specific cases, as long as their further processing by the Company is not necessary for specific legal reasons. We point out that this right does not apply over reasons of public interest in the field of public health.

Right to restriction of personal data processing (Article 18)

You have the right to request that the processing of your personal data be restricted, as long as the legal conditions are met. In this case, we will have the right to store your personal data, but not to process it further, unless we get your consent or one of the cases defined in the Regulation applies.

Right to object to the processing of your personal data (Article 21)

As long as the legal conditions are met, you have the right to object to the processing of your personal data, carried out by the Company for the fulfillment of a duty in the public interest or for purposes of pursuing legitimate interests of the company or a third party as well as for the purposes of scientific or historical research or statistical purposes.

Right to data portability (Article 20)

You have the right to receive the personal data you have provided the Company with for your own purposes, in an electronic copy, and transmit them to third parties in an easy and secure manner, as long as their processing by the Company is based on your consent or a contract between us and is conducted in an automated (i.e., electronic or digital) manner.

Right to file a complaint (Article 77)

You have the right to file a complaint with the Hellenic Data Protection Authority (1 Kifisias Avenue, Athens 115 23, tel. 210 6475600) in the event of an unfortunate incident of breach of your personal data.

Right to withdraw your consent (Article 7)

You have the right to withdraw the consent you have given to the Company for the processing of your personal data at any time and without consequences. Such withdrawal applies for the future and does not affect the legality of the processing prior to the withdrawal.

We point out that the above rights are not absolute and there are specific conditions and limitations for their exercise. The Company will inform you of any special exceptions or limitations on an individual basis, as long as these apply to your case, upon your request.