

## PRIVACY POLICY FOR SUPPLIERS - PARTNERS - CUSTOMERS

### Controller

The company under the corporate name "Bank Information Systems SA" and the distinctive title "TIRESIAS SA" (hereinafter the Company), which has its registered office in Marousi, Alamanas 2 Street, 151 25, P.C. 210 63.82.200 processes its partners' - suppliers' - customers' personal data.

This policy sets out the principles applied by the Company during the processing of the aforementioned data (categories, legal basis, purpose, protection measures, rights, etc.) and aims to inform the data subjects about the processing. It is posted on our Company websites (<http://www.tiresias.gr/PersonalDataProcessing.html> & <https://tsek.teiresias.gr/el/Home/PrivacyPolicy>) and when necessary it is modified or updated.

We assure you that all information we collect about you is confidential, used only for the legitimate purposes and protected by high level security systems.

### When we collect your personal data?

1. During your participation in procurement procedures conducted by our Company.
2. When signing a contract with our Company and during its life cycle and its execution, when the contractual terms change and at the end of the contract.
3. When you contact us in writing on a contract related matter (in writing or electronically) or to submit an application.
4. During your presence at the Company's premises that are monitored by CCTV camera surveillance system.

### What categories of personal data do we collect?

We process the following categories of personal data (in whole or in part, depending on the type of cooperation / contract and the physical presence or not of data at our Company's premises) of our partners-suppliers-customers:

- in the case of single-membered companies / traders: Basic identification data (name, father's name, address, telephone numbers, e-mail addresses, VAT number, Tax Office, ID number), distinctive title / type of business, registered office address, bank accounts,
- basic identification data of legal representatives, representatives, project managers, board members, etc. (name, father's name, address, telephone numbers, e-mail addresses), tax and social security clearance),
- financial data (e.g. payments, invoices, etc.),
- your image as well as your movement to the extent that you move in areas of the Company where video recording (CCTV) takes place in accordance with the relevant procedure for reasons of protection of persons and goods (<http://www.tiresias.gr/docs/NotificationAboutPersonalDataProcessingThroughACCTV.pdf>).

When you enter the premises of our offices and for the purpose of protecting people and goods, incoming data is recorded in a relevant book kept by the private security company.

### **Measures to prevent the spread of the pandemic due to Covid 19 and protect employees**

In the context of prevention and protection, every incoming person undergoes a temperature measurement

(<http://www.tiresias.gr/docs/NotificationAboutBodyTemperatureMeasurement.pdf>, while at the same time there is a case-by-case obligation to conduct a self-test, in accordance with the [relevant procedure](#) of the Company.

### **Purposes for which we process your personal data**

We process your personal data for the purpose of participating in procurement procedures, the preparation, execution, operation and termination of the contract between us and in general the management of the business relationship between us (contracts, invoices, payments, etc.), but also for Company's compliance with its legal obligations and for establishment of our legal claims or defence against claims brought before the Courts, Authorities etc. Personal data relating to your image and movement to the extent that you move to the Company's premises where video recording takes place for reasons of protection of persons and goods, is collected to protect persons and goods of the Company.

### **Legal Grounds for Processing Data**

Legal grounds for processing data are, depending on the case: (a) The legitimate interest we pursue (the operation of our company as well as the protection of persons and goods in relation to the CCTV surveillance system) (b) Our compliance with obligations arising from the law, (c) The execution (drafting, operation, termination) of the contract between us, (d) your consent.

### **To whom we disclose your personal data and where data is stored**

The Company does not disclose your personal data to third parties but is processed only by the Company's authorized staff under strict confidentiality. Exceptionally, your personal data may be shared:

- (a) with Public authorities for the purposes of the Company's compliance with its legal obligations,
- (b) with third parties who provide services to the Company, such as human resources companies, lawyers/law firms (in case of extrajudicial or judicial actions regarding legal claims of the Company or against it). These persons, who act as processors on behalf of our Company, are bound by the applicable legislation (European and National) on personal data, and
- (c) before the courts for the exercise and defence of the Company's rights. Your data is kept within Greece under conditions of organizational and technical security measures.

### **Principles of processing and protection measures**

Our Company, indicatively and not restrictively:

- processes only your personal data that is necessary for the above purposes and only for these purposes,
- implements appropriate technical and organizational measures for the security of personal data (ensuring confidentiality, integrity and availability) by design and by default,
- implements procedures and systems for the confidentiality of the processing of personal data, as well as for their protection from accidental or unlawful destruction, accidental loss, alteration, prohibited dissemination or access and any other form of unlawful processing (e.g. use of tools for access controls and data loss prevention),
- informs the data subjects (citizens and employees), in accordance with the Regulation (EU) 2016/679 (GDPR),
- respects the principle of personal data minimization,
- ensures the exercise and satisfaction of the rights of the subjects,

- has drawn up documents, policies and procedures that prove its compliance with the principle of accountability (privacy policy, cookies policy, recording of the type, categories and flows of personal data, compilation of processing records, impact assessment, etc.) as they are mentioned in the GDPR;
- has appointed a Data Protection Officer and set up a group for the protection of personal data;
- educates and raises awareness among its employees regarding the protection of personal data;
- amends its cooperation agreements with processors on its behalf, in accordance with Article 28 of the GDPR, ensuring that processors are fully GDPR compliant as well.

### **How long we keep your personal data**

We keep your personal data in line with the requirements set by law for a period during which Tax Authorities, National Social Security Fund and other Authorities, have the right to audit our Company. If there is no shorter period of time set by law, the above data is kept for twenty (20) years, i.e. equal to the general limitation period. In the event that there is a relevant pending trial, we will keep your data for five (5) years from the issuance of an irrevocable court decision. Insurance and tax clearance certificates are destroyed one (1) year after their receipt, unless they are incorporated in tax documents, in which case they are destroyed along with them.

When the processing of your personal data is no longer necessary, your data will be destroyed in a secure and proven manner. Video surveillance data is stored for a period of 14 days.

### **Is your Data safe?**

We are committed to safeguarding your Personal Data. We have taken appropriate organizational and technical measures for the security and protection of your Data from any form of accidental or unlawful processing.

Tiresias S.A. follows strict procedures and safety policies, which are part of the ISO 9001:2015 quality assurance standard, according to which the company has been certified, while its compliance is constantly regularly both by internal and by external inspections.

Those measures shall be reviewed and amended when necessary.

### **What are your rights? How to you exercise them?**

You have the following rights:

- a) Be informed when we collect and process your personal data, data sources, the purposes of processing it, its retention period and request a copy of any personal data we hold that concerns you (**right of access**).
- b) Request the correction and/or completion of your personal data in order to be complete and accurate (**right of rectification**). You should provide us with any necessary document substantiating the need to rectify the inaccurate or incomplete data.
- c) Request the restriction of processing your personal data (**right to restrict processing**).
- d) Refuse and/or object to the processing of your personal data that we keep (**right to object**).
- e) Request the transfer of your personal data that we keep to any other controller of your choice in a safe and secure way, without affecting its usability (**right to data portability**).

- f) Request the deletion of your personal data from the files we keep for example when your data is no longer necessary or unlawfully processed or no longer meets one of the abovementioned lawful grounds (**right to be forgotten**).

With regards to the exercise of your above rights, please note that:

- The Company has in any case the right to refuse the satisfaction of your request to limit the processing or erasure of your personal data or your objection to the processing, if the processing or retention of the data is necessary for the establishment, exercise or defence of its legal rights or the fulfilment of its obligations.
  - The exercise of the right to portability does not imply the deletion of your data from our records, which is subject to the terms of the immediately preceding paragraph and the conditions of the Rules of Procedure.
  - The results from the exercise of these rights have effect for the future and does not concern data processing already carried out.
- g) Lodge a complaint with the Hellenic Data Protection Authority [www.dpa.gr](http://www.dpa.gr) if you consider that your rights are being violated in any way (**right to complain to the Authority**).

For the exercise of the above rights you may address in writing to the Company's address (Alamanas 2, Marousi, 151 25), or electronically to the e-mail address [apanopoul@tiresias.gr](mailto:apanopoul@tiresias.gr) or by phone at 210 63 82 252, and in any case you can also contact the Company's Data Protection Officer at [dpo@tiresias.gr](mailto:dpo@tiresias.gr) address.

#### **When do we respond to your Requests?**

We respond to your Requests free of charge without any delay, and in any case within one (1) month from the time we receive your request. However, if your Request is complex or there is a large number of your Requests, we will inform you within the month if we need to receive an extension of another two (2) months within which we will respond to you.

If your Requests are manifestly unfounded or excessive, in particular due to their repetitive nature, the company may impose a reasonable fee, taking into account the administrative costs for the provision of the information or the execution of the requested action, or refuse to act on the Request.

#### **Who can you contact for the progress of your Requests?**

For more information you can call during working days and hours at +302103676700 (Customer Service Phone Line).

#### **Do we make use of automated decision-making, including profiling when processing your Data?**

We do not make decisions or profiling based on automated processing of your Data.

#### **What is the applicable law we processing your Data?**

We process your Data in accordance with the General Regulation on the Protection of Personal Data 2016/679/EU, and in general, with the applicable national and European

legislative and regulatory framework for the protection of personal data (Law 4624/2019, Law 3471/2006).

**Data Protection Officer (DPO)**

The Company has appointed a Data Protection Officer in accordance with Art. 37 of the General Data Protection Regulation (tel. +30 210 36.76.700, [dpo@tiresias.gr](mailto:dpo@tiresias.gr), Alamanas 2, 151 25, Marousi)