

PRIVACY POLICY OF JMENAV S.A. («THE COMPANY») FOR THE PROTECTION OF NATURAL PERSONS AGAINST THE PROCESSING OF THEIR PERSONAL DATA ACCORDING TO THE GENERAL DATA PROTECTION REGULATION (GDPR) No 679/2016 OF EU

The General Data Protection Regulation (GDPR) is the European Regulation 2016/679 adopted on 27.04.2016 and effective from 25.05.2018 for all members of the European Union in order to improve the protection of individuals with regard to the processing of their personal data.

Definitions as mentioned in GDPR:

1) Definitions of article 4 :

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;

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;

Restriction of processing means the marking of stored personal data with the aim of limiting their processing in the future;

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

Pseudonymisation means 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 organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;

Filing system means any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis;

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

Recipient means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

Third party means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

Consent of the data subject means 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 means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

Genetic data means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;

Biometric data means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;

Data concerning health means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;

Main establishment means:

a) as regards a controller with establishments in more than one Member State, the place of its central administration in the Union, unless the decisions on the purposes and means of the processing of personal data are taken in another establishment of the controller in the Union and the latter establishment has the power to have such decisions implemented, in which case the establishment having taken such decisions is to be considered to be the main establishment;

b) as regards a processor with establishments in more than one Member State, the place of its central administration in the Union, or, if the processor has no central administration in the Union, the establishment of the processor in the Union where the main processing activities in the context of the activities of an establishment of the processor take place to the extent that the processor is subject to specific obligations under this Regulation;

Representative means a natural or legal person established in the Union who, designated by the controller or processor in writing pursuant to Article 27, represents the controller or processor with regard to their respective obligations under this Regulation;

Enterprise means a natural or legal person engaged in an economic activity, irrespective of its legal form, including partnerships or associations regularly engaged in an economic activity;

Group of undertakings means a controlling undertaking and its controlled undertakings;

Binding corporate rules means personal data protection policies which are adhered to by a controller or processor established on the territory of a Member State for transfers or a set of transfers of personal data to a controller or processor in one or more third countries within a group of undertakings, or group of enterprises engaged in a joint economic activity;

Supervisory authority means an independent public authority which is established by a Member State pursuant to Article 51;

Supervisory authority concerned means a supervisory authority which is concerned by the processing of personal data because:

a) the controller or processor is established on the territory of the Member State of that supervisory authority;

b) data subjects residing in the Member State of that supervisory authority are substantially affected or likely to be substantially affected by the processing; or

c) a complaint has been lodged with that supervisory authority;

Cross-border processing means either: i) processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a controller or processor in the Union where the controller or processor is established in more than one Member State; or ii) processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State

Relevant and reasoned objection means an objection to a draft decision as to whether there is an infringement of this Regulation, or whether envisaged action in relation to the controller or processor complies with this Regulation, which clearly demonstrates the significance of the risks posed by the draft decision as regards the fundamental rights and freedoms of data subjects and, where applicable, the free flow of personal data within the Union;

Information society service means a service as defined in point (b) of Article 1(1) of Directive (EU) 2015/1535 of the European Parliament and of the Council (!);

International organisation means an organisation and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.

II) Subject of Personal Data : means every natural or foreign person identified or identifiable to whom the information (personal data) relates and which contacts the Company for various reasons. These include Company's employees and sole proprietorships. It does not include natural persons who represent legal entities in their relations with the Company

III) Data Controller : means a natural or legal person, a public authority, a service or another body which, alone or jointly with others, defines the purposes and the manner in which personal data are processed.

IV) COLLECTION AND PROCESSING OF PERSONAL DATA

The Company processes personal data of Employees, Customers, Suppliers and other associates that receive either due to employment or service contracts or due to its legitimate business activities as well as those received or brought to its knowledge by a third natural or legal person or public body and which are necessary either for the attainment of the legitimate interests of the Company itself or a third party or for the fulfillment of its tasks which are carried out in the public interest (eg tax and insurance authorities). Subjects of Personal Data are natural persons, who come into contact and communicate with the Company for any kind of cooperation. Natural persons who represent legal persons for their transactions with the Company are not considered Personal Data Subjects according to the GDPR.

The use and processing of Personal Data by the Company as well as its sending and transmission to competent bodies is absolutely necessary to achieve the legitimate interest, given that it stems either from employment or service contracts, or from its legal activity and the law and the purpose of fulfilling the Company's legal obligations and for the exercise and defense of its legal rights respectively.

Personal Data processed by the Company are not disclosed or forwarded to third parties outside of the above frameworks of activity, its employees within their scope of competence and any other necessary under the law as well as to natural persons or companies providing services to the Company (including, but not limited to, accountants, agents, carriers, lawyers, IT services, insurers, legal services, tax, customs and other public services), who act on behalf of the Subjects of Personal Data and on the basis of the written instructions of the Company and may not use data to their benefit or disclose it to third parties.

The security of the Personal Data of the Data Subjects is of utmost importance to the Company which is committed to maintain the highest technical and organizational measures to protect the integrity, confidentiality and availability of such personal data and to protect them against unauthorized access, misuse, disclosure, illegal destruction or loss.

In particular, the personal data collected by the Company pursuant to Article 5 of the GDPR:

(a) shall be processed lawfully in a transparent manner in relation to the Subject of personal data ('legitimacy, objectivity and transparency'),

(b) are collected for specific, explicit and legitimate purposes and are not further processed in a manner inconsistent with these purposes.

(c) are appropriate, relevant and limited to what is necessary for the purposes for which they are processed ("data minimization"),

(d) are accurate and, where necessary, updated and all reasonable measures are taken to immediately delete or correct the personal data which are inaccurate in relation to the purposes of the processing ("accuracy"),

(e) are retained in a form which permits the identification of the Subjects of personal data only for the time required for processing purposes.

(f) are processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures ('integrity and confidentiality').

The processing of personal data is carried out in accordance with Article 6 of the GDPR under the following conditions:

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes; Consent to the processing of personal data is not required for data relevant and necessary for the performance of legal actions, such as contracts, pricing, withholding tax. Consent is normally required for data that does not arise from required legal procedures.
- b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

V) CONTROL AND DESTRUCTION OF PERSONAL DATA

The Company stores the personal data of employees, candidates for staff positions that have not been selected, customers (including sole proprietorships), partners, etc. for a period of up to 6 months from the termination of the contract or cooperation in any way, in a secure file in paper form in area with controlled access as well as the Company's central server which is locked (complexive password) and protected by antivirus and firewall. The Company reserves the right to retain the Personal Data of the Data Subjects for a longer period of time in order to fulfill its obligations under the Law or to support its legal claims and defend its legal interests. In the event of a legal dispute, the Personal Data will be kept in any case until the end of the pending litigation. The company processes personal data of natural person suppliers and customers in the context of their cooperation with the company as well as for the company's legal tax and insurance obligations. The company stores, maintains and communicates the personal data of the above exclusively to the competent authorities and banks.

Process of destruction / deletion of data after the end of processing for the purposes of the Company

When the purposes for which the Company maintains the data have been fulfilled and the Company does not need to keep the data in accordance with what has been communicated to the Subject of personal data then personal data are erased (electronic file) or destroyed (form file, image / sound file).

The decision to destroy / delete data is taken by the Company's management.

When this data is deleted, it is deleted from all the Company's records of the computer bin and any backup files expressly included. If paper copies are kept, they are always destroyed in a shredder or recycling company according to the ISM regulation.

The Company keeps indefinitely the personal data of third parties who contact the Company and request information by making their personal data available to it.

VI) Rights of Subjects of Personal Data

- i) Right of information
- ii) Right of access
- iii) Right of rectification
- iv) Right to erasure ("right to be forgotten")
- v) Right to restriction of process
- vi) Right to data portability
- vii) Right to object

Subjects of personal data such as indicative suppliers, customers, partners, etc. can make use of the above rights by submitting relevant requests to the Company.

VII) Protection of Information

The Company protects the information it has and processes pursuant to the Regulation as regards:

(a) their integrity, ie the prevention of any deterioration, loss or destruction (b) their confidentiality, ie to prevent any leakage to unauthorized persons (c) their availability, ie the possibility of using and accessing them, where necessary, without barriers, while applying for their protection: i) technical and organizational measures such as pseudonymisation, personal data minimization and use, certified encryption protocols ii) physical security measures iii) logical access security measures iv) communication security measures v) operational security measures vi) procurement security measures. The company's website has an SSL Security Certificate and the company's website server uses TLS and SSL encrypted protocols that provide absolute security in internet communication.

VIII) Violations of Personal Data & Cooperation with the Supervisory Authority

The Company applies defined procedures to identify and record events that compromise the confidentiality of Personal Data subjects. In particular, for Personal Data leak events, immediate notification to the Data Protection Authority is provided in accordance with Regulation 679/2016.

IX) Information, Awareness - Evaluation & Review

The continuous updating and awareness of the personnel of the Company regarding the protection of Personal Data is part of the training and briefing of the Company's staff. The Company is responsible for evaluating and reviewing the performance of its procedures, policies and measures to protect personal data in order to continually improve its protection and security.

X) Risk Management

The Company carries out risk management, which includes::

- 1) Identification of risks and risk analysis

- 2) Risk assessment and risk management
- 3) Monitoring, review and control of actions for risk treatment

It should be noted that in the context of risk management, a risk assessment of the basic objectives concerning the protection of personal data is carried out in terms of integrity, confidentiality and availability.

XI) OUR WEBSITE

Our page is used to inform website visitors regarding our policies with the collection, use, and disclosure of Personal Information if anyone decided to use the Website our website

The Company may process part of, or the total data sent by the users for statistical purposes and for improving the provided services and information, in accordance with the terms of Regulation (EU) 2016/679.

The Company has taken the appropriate technical and organizational measures to protect user's data and privacy, from accidental events and malicious actions.

Collection of Personal Data

While using the website you may be required to provide certain personally identifiable information, including but not limited to your name and email. The information that is collected will be used to contact or identify you and for fulfilling the Company's commitments to you as users. The duration of the data-processing is limited by these purposes. The Company can use the personal data for informative purposes, website usage analysis, or to send emails or newsletters to the registered users, unless the latter do not wish to receive such material and have explicitly expressed their wish to the Company and for as long as such consent is not revoked.

Whenever you visit our website, we collect information that your browser sends to us that is called Log Data. This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser version, pages of the website that you visit, the time and date of your visit, the time spent on those pages, and other statistics.

Cookies

Cookies are files with small amount of data that is commonly used an anonymous unique identifier. These are sent to your browser from the website that you visit and are stored on your computer's hard drive.

Our website uses these "cookies" to collect information and to improve the experience of the user that visits the website. You have the option to either accept or refuse these cookies, and know when a cookie is being sent to your computer. If you choose to refuse our cookies, you may not be able to use some portions of the website.

Service Providers

We may employ third-party companies and individuals due to the following reasons:

- To facilitate our website
- To perform website-related services; or
- To assist us in analyzing how our website is used.

We want to inform our website users that these third parties have access to your Personal Information. The reason is to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the information for any other purpose.

Links to Other Sites

The website may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over, and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Children's Privacy

Our services do not address anyone under the age of 13. We do not knowingly collect personal identifiable information from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do necessary actions.

Website Security

Our web site has an SSL Security Certificate and the server where is hosted our web site is using state-of-the-art TLS (Transport Layer Security) and SSL (Secure Sockets Layer) encryption protocols that provide complete communications security over the internet.

All data sent to and received by our web site, using the web browser of your device (desktop, tablet, laptop, mobile etc.) are 100% encrypted.

SSL certificate is an on-line certificate issued by independent and trustworthy organizations called Certificate Authorities that undertake the identification of the site's data and the secure transfer of data between those websites and their users.

SSL offers server authentication by the client, client authentication by the server, and provides a secure encrypted communication channel between both parties and complete security in your communication with this site.

Control Information using your Google Account

Ad Settings helps you control ads you see on Google services (such as Google Search or YouTube), or on non-Google websites and apps that use Google ad services. You can also learn how ads are personalized, opt out of ad personalization, and block specific advertisers.

If you are signed in to your Google Account, and depending on your Account settings, My Activity allows you to review and control data that's created when you use Google services, including the information Google collects from the sites and apps you have visited. You can browse by date and by topic, and delete part or all of your activity.

Control Information using your Facebook Account

You can use your Facebook ad preferences to learn why you're seeing a particular ad and control how Facebook uses collected information to show you ads.

To show you better ads, Facebook uses data that advertisers and other Facebook partners provide about your activity off Facebook company products, including websites and apps. You can control whether Facebook uses this data to show you ads in your Facebook ad settings.

The Facebook Audience Network is a way for advertisers to show you ads in apps and websites off the Facebook Company Products. One of the ways Audience Network shows relevant ads is by using your ad preferences to determine which ads you may be interested in seeing. You can control this in your Facebook ad settings.

XII) Changes to This Privacy Policy

The Company may update its Privacy Policy from time to time. The Company will notify you of any changes by posting the new Privacy Policy on this page.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.