

SECURITY AND PERSONAL DATA PROTECTION POLICY

Malamis and Associates Ltd., hereinafter referred to as "the Company", attaches great importance to the lawful processing, security and protection of personal data.

This Privacy Policy explains the way the Company collects, processes and shares personal data when you visit our website or when we provide our services to you, in compliance with the General Regulation (EU) 2016/679 (GDPR) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, the applicable national law (4624/2019) and the decisions of the Hellenic Data Protection Authority (HDPA).

Please read these terms of the Company's Security and Personal Data Policy carefully. By using our website, you expressly accept the practices described herein, which form part of the contractual relationship between us hereinafter and are by default incorporated into the terms of use of each of our services.

1. What is personal data

Personal data is any information on paper or electronic medium, which can lead, either directly or in combination with other pieces of information, to the unique identification or location of a natural person. Examples of personal data: full name, tax ID, social security number, physical and electronic addresses, landline and mobile phone numbers, call logs, SMS/MMS recipients, bank/debit/prepaid data card information, email addresses, equipment or terminal identifiers, your browsing history (log files, cookies, etc.), and any other information that allows the unique identification of a natural person, under the provisions of the General Data Protection Regulation (EU 2016/679), national law N. 4624/2019 on data protection and any other applicable law, as well as the decisions of the Hellenic Data Protection Authority (HDPA).

2. Which type of personal data do we collect

- When you visit our website, we may collect the following personal data:

Our website does not require any kind of registration, allowing you to browse without having your personal data collected.

However, we may collect the following personal data:

- Personal data you provide through the online contact form, including first name, surname, email address and personal information you might disclose in your message to the Company.
- Personal information collected with the use of cookies. You can find the Cookie Policy of the Company below.
- If you are a present or future client of our Company, depending on the circumstances and the nature of the services you require, we may collect the following personal data:

First name, surname, telephone numbers (landline and/or mobile), address, ID number, Tax Identification Number, National Insurance number/ Social Security number, email address, financial information we collect for invoicing and payment purposes, other personal data you have provided us in order for our Company to secure, protect and defend your IP rights or when you have instructed us to represent you in Court or in the context of any other activity of the Company.

Special categories of data

In principle, we don't collect special categories of data, namely data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and we don't process genetic or biometric data for the purpose of uniquely identifying a natural person, data concerning health or a natural person's sex life or sexual orientation, unless you have provided us your explicit consent in this regard or if this required to establish, exercise or defend against legal claims.

Personal data of third parties

While providing our services to you and in the context of the instructions you have given us, it might be necessary for our Company to process personal data of third parties, such as

counterparties, inventors, creators, designers etc. In this case, personal data we collect and process may include first name, surname, home and/or work address, contact details etc.

3. Ways of collecting personal data

The Company may collect personal data:

Directly from you:

- When you submit your personal data for identification purposes;
- When you contact the Company by completing the online contact form, via our call center, by email or in any other way and for any reason, such as to submit comments, enquire about our services etc.;
- While providing our services to you;
- When you provide personal information for invoicing purposes;
- When you visit our website;
- When you purchase a service so that our Company is able to verify your age and confirm whether you are legally allowed to work with us or if you need your parents'/guardians' consent or signature;
- When you subscribe to mailing lists, in order to receive newsletters and other marketing materials, by mail or electronically, or when you participate in questionnaires and surveys.

From third parties

When we receive documents, requests, orders, petitions, warrants, calls etc. from third parties (natural or legal persons), such as supervisors, prosecutors, customs authorities and supervisory authorities, courts, tax authorities, in order to investigate crimes and protect you against fraud or other forms of crime and any infringement of legally protected rights and interests.

4. Lawful processing of personal data

The term “processing” has been defined as any operation performed upon personal data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

The Regulation applies to the processing of personal data, conducted wholly or partially by automated means, as well as to non-automated processing for archiving purposes.

The Company will use your information for the following lawful processing purposes:

- In order to perform a contract, or in the context and for the purposes of our pre-contractual relationship, following your request or having obtained your consent, in order to protect your IP rights, help you meet your legal obligations or provide consulting services;
- Respond to your requests and inquiries about our services, provide information and updates, respond to your suggestions and comments on improving our services;
- To inform you about the results of surveys you may have participated in;
- To analyse website traffic and improve your user-experience, and to provide you with information about services and promotions;
- For internal purposes, such as internal management processes, fraud prevention, administrative processes, pricing, invoicing, accounting, billing and internal controls.
- For archiving purposes;
- For any other reasons provided by law and competent authorities;

5. Legal grounds for processing

The Company processes personal data only in the following circumstances:

- With the consent of the individuals concerned. You can always contact us at privacy@malamis.gr in order to withdraw your consent;
- When there is a contractual obligation and the processing of personal data is necessary for the performance of the contract;
- In order to meet a legal obligation under EU or national legislation, such as tax obligation or the provision of information to public authorities or law enforcement;
- For the Company's legitimate interests, when there is no serious impact on the rights and freedoms of data subjects;
- To protect the vital interests of an individual;
- Where processing is necessary for the performance of a task carried out in the public interest under EU or national legislation;

6. Which are the principles of collection and processing?

The Company and its trained personnel apply the following GDPR Processing Principles EU 2016/679

- 1) **Lawfulness, fairness and transparency.** According to this principle, personal data are being processed lawfully and fairly, in a transparent manner,
- 2) **Purpose limitation.** According to this principle, personal data are being collected and processed for specific, clearly identified and lawful purposes.
- 3) **Data minimization.** According to this principle, the personal data must adequate, necessary and sufficient to properly fulfil the Company's stated purposes.
- 4) **Accuracy.** According to this principle, personal data held by the Company must be accurate and up-to-date. Inaccurate data shall be corrected or deleted.

- 5) **Confidentiality and Integrity** . According to this principle, processing is conducted in a way which protects personal data from unlawful processing, loss, destruction or alteration.
- 6) **Storage time limitation.** According to this principle, the Company holds personal data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- 7) **Accountability of the responsible for the processing.** According to this principle, the controller (Company) is responsible for complying with the Regulation and bears the burden of proof before judicial and supervisory authorities.

7. Rights

The Company protects and safeguards the following rights regarding the use of Personal Data, in accordance with the Regulation 2016/679. These rights can be exercised in relation to all the processes performed and all the services provided by the Company:

- **Right to be informed**

You have the right to know which personal data we are processing and for which purpose.

- **Right of access**

You have the right to access your personal data for free.

- **Right to rectification**

You have the right to ask the rectification of inaccurate and incomplete personal data.

- **Right to erasure**

You have the right to have personal data erased, unless the processing is required by law.

- **Right to restrict processing**

You have the right to request the restriction of the processing of your personal data if there are concerns regarding their accuracy and in accordance with the Regulation.

- **Right to data portability**

You have the right to request the transfer of your personal data to another controller.

- **Right to object**

You have the right to object to the processing of your personal data, under the conditions set by the Regulation.

- **Rights related to automated decision-making including profiling**

You have the right to object to decisions made about you, if these decisions are based solely on automated means, including profiling, with legal or similarly significant effects.

In order to exercise your rights, you can contact us at privacy@malamis.gr.

The Company will respond to your request within thirty (30) days of receipt of the request.

Minimization, storage and deletion of your data

The Company will always ask you for the minimum personal data required by law when you connect to our online platforms and services, when you purchase our services, such as patent and intellectual property services or legal advices, or when you take part in promotions.

Our Company retains your personal data only for as long as required by the contractual terms of each service, in accordance with the applicable law and the processing purposes. After that, the data will be anonymised or destroyed.

You can always reach out to us if you have any questions about which data we collect and process and request their rectification or deletion, unless their retention is necessary for tax, evidence, judicial purposes or the prosecution of unlawful acts.

8. Cookie Policy

This website uses cookies, in accordance with the European Directive E-Privacy 2009/136/CE (to be replaced by the ePrivacy Regulation). Cookies are web-based tools for collecting and analysing information. We use cookies that help us track website activity, evaluate and improve the performance of our website, as well as in order to improve the overall user experience, by identifying the country where our clients are based or saving user preferences.

This website complies with the following principles:

1. The use of cookies is not allowed, unless the Company has obtained the data subject's informed consent.
2. When you visit our website, you will be prompted to accept or refuse cookies. The Company will store your preferences so you won't be asked again.
3. Cookie consent is never assumed, through pre-selected fields. Data subjects are always requested to confirm they agree with the use of cookies.
4. Cookie consent can be provided and withdrawn in the same, easy way.
5. Cookie consent is not necessary for strictly necessary cookies. It is necessary for functional cookies, which are used to improve user-experience. Rejection of functional cookies might have a negative impact on the website's overall user experience.

9. Transmission of your data to third parties

As a rule, our Company does not transfer your personal data to third parties unless we act as intermediaries and to the extent required to fulfill your requests to deliver services to you. Such third parties may be official state and supervisory bodies (e.g., prosecuting and supervisory authorities, law enforcement, Cybercrime authorities, Hellenic Telecommunications and Post Commission etc.) when we are required to comply with the law and in order to prevent illegal actions (e.g. trafficking of counterfeit products, telecommunications fraud, insult, infringement of personal rights etc.). Third parties may also be telecommunication companies, television stations, cloud providers, hospitals, professional associations, audiovisual content providers, shipping companies, booking systems and other global distribution systems.

Our Company chooses trusted providers and strive to put in place contractual restrictions on third parties that receive your personal data, in order to ensure that they use them in accordance with this Policy and the applicable European and international data protection laws. However, we cannot guarantee that third parties will not use or disclose this data without your permission.

In order to process your data, we may need to transfer your information to other countries, mainly within the European Economic Area (EEA) but also outside the EEA in exceptional cases, relying on EU adequacy decisions, corporate binding rules, standard contractual obligations and approved codes of conduct.

10. Security of personal data

We take the appropriate technical and organizational measures to ensure the confidentiality, integrity and availability of your data and that your personal information is transferred, stored and processed, in accordance with appropriate security standards and procedures, the terms of this Policy and applicable data protection laws.

Our personnel has been trained to recognise the importance of protecting privacy rights and protect personal information. To this end we have appropriate security policies in place and we use appropriate technical and operational tools, such as anonymisation, pseudonymisation, data encryption, firewalls, access levels, authorised employees, staff training, periodic audits, compliance with international standards and business continuity.

Any affiliate of ours who may have access to personal information, uses it solely for the purposes outlined above. We share the information you give us exclusively in the ways described in this Policy and with your consent, which you may freely withdraw by contacting us.

11. Targeted Marketing

We do not use automated tools to track and evaluate your profile and your preferences in order to serve ads or send you personalised offers. In addition, we do not share your personal information with third parties who want to direct advertisement to you, unless you have explicitly consented to them. If you would like us to stop sending you updates you can click on the link at the end of the email you received from us in order to unsubscribe.

12. Links to third-party websites

Generally, our Company website does not contain links that lead to third-party websites. The latter are operated and maintained independently by third parties and the Company has no responsibility for the content, actions or policies of these websites. Please read carefully the respective data protection policies of the different websites you visit, as they may differ significantly from ours.

13. Unsolicited commercial communication

The Company does not allow the transmission of bulk or spam commercial emails. In addition, we do not allow the sending of messages to and from our customers that use or contain

invalid or fake headers, invalid or inaccurate domain names, techniques that conceal the origin of each message, false or misleading information or which otherwise violate the terms of use of our website. We do not allow the collection of emails or general information of our customers through our website or our services in any way. We do not allow or authorize any attempt to use our services in a way that could harm, render unavailable, overburden any part of our services or which could prevent anyone wishing to use our Services from doing so.

If we identify any unauthorized or inappropriate use of our services or website, we may, without notice and at our sole discretion, take appropriate measures and block messages from a particular domain, a specific email server or IP address. We have the ability to delete immediately any account that makes use of our services, if we believe that this account transmits or is associated with the transmission of messages, in violation of this Policy.

14. Contact for questions or comments.

If you have any questions or comments about this Policy or if you believe that we have not followed the principles outlined above, please email us at privacy@malamis.gr or send us a letter at the following address: Palaia Tatoiou 8, 145 64 Kifisia.

If you have questions on this Privacy Policy and/or the way our Company complies with this Privacy Policy, you may also contact the Hellenic Data Protection Authority (HDPA): contact@dpa.gr, Kifisias Avenue 1-3, 11523 Athens, contact number (+30) 210 6475600.

15. Enforcement period of the Security and Protection of Personal Data Policy

This Policy was published by the Company on ... / ... /2020 and is subject to periodic improvement and revision. Any changes to this Policy will apply to the information we hold, as well as to the information we may collect after publishing the revised edition. Using our website following the revision of our Policy implies that you accept any changes made.