

Data Protection Policy

I. Introduction

The company under the name “**GR8 GEO Private Company**” with registered address at Athens, Greece (Street Dimitrakopoulou no. 79) with VAT Number 801003630 and Registration Number 146745101000 is a private company (hereinafter “**the Company**”), which operates under the law 4072/2012, as in force. The company’s purpose is identified in the preparation of studies and the provision of advice on issues related to civil engineering and geology (hereinafter “**the Services**”). In particular, the Company specializes in geotechnical engineering, geotechnical earthquake engineering, geology and seismic hazard.

The personal data that the Company processes to provide the abovementioned services are related to its clients and other individuals as necessary, including staff and suppliers’ staff.

A data protection policy (DPP) (hereinafter “**the Policy**”) is a security policy dedicated to standardizing the use, monitoring, and management of data. This policy sets out the Company’s commitment to ensuring that any personal data, including special category personal data, which may processes, is carried out in compliance with data protection law. The Company ensures that good data protection practice is embedded in the culture of its staff and organization.

This Policy is a part of the terms and conditions that govern the Company’s services. By accepting these terms and conditions, you explicitly accept the provisions of this Policy.

II. Definitions

“Data Protection Law” includes the General Data Protection Regulation 2016/679, Greek law 4624/2019 for the implementation thereof and all relevant EU and Greek data protection legislation, including relevant decisions, opinions or guidelines issued by the European Data Protection Board and the Hellenic Data Protection Authority.

Before diving into the specific elements of the policy, it is essential to establish clear definitions for key terms and concepts. Some important terms to define include:

- **Personal data:** Information relating to an identified or identifiable individual, such as name, identification number, location data, online identifiers etc.
- **Processing:** Operation performed on personal data, such as collection, recording, organization,

structuring, storage, adaptation, retrieval, destruction, etc.

- **Data controller:** The entity that determines the purposes and means of the processing of personal data.
- **Data processor:** The entity that processes personal data on behalf of the data controller.
- **Data subject:** The individual whose personal data is being processed.
- **Consent:** A freely given, specific, informed, and unambiguous indication of the data subject's agreement to the processing of their personal data.

III. Scope

This Policy applies to all personal data processed by the Company in relation to its business activities (primarily clients, suppliers, freelance, employees, other involved parties etc.) and is part of the Company's approach to compliance with Data Protection Legislation. This Policy also applies to all websites, online applications, and online and offline promotional actions by the Company as well as any Service or function provided by the Company that refers to this Policy or provides a link hereto. Please note that this Policy applies to the use of the Services, regardless of the use of a computer, mobile phone, tablet, TV, or any other device for access to the Services. Additionally, this Policy applies to Services that are provided without the use of electronic means.

IV. Data Protection Principles

The Company complies with the data protection principles set out below. In the course of the processing of personal data, the Company ensures that personal data:

- is processed lawfully, fairly and in a transparent manner in relation to the data subject ("**lawfulness, fairness and transparency**").
- is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ("**purpose limitation**").
- is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed ("**data minimization**").
- is accurate and, where necessary, kept up to date and that reasonable steps will be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay ("**accuracy**").
- is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed ("**storage limitation**").
- is 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**”).

Last but not least, the Company will facilitate any request from a data subject who wishes to exercise his/her rights under data protection law as appropriate, always communicating in a concise, transparent, intelligible and easily accessible form and without undue delay.

V. Personal Data Collection – Purposes / Process / Procedures

The Company collects and uses Personal Data to manage your relation with it and in order to offer its Services to you, in a proper manner. The personal data that the Company maintains relating to you or other individuals may differ depending on the relationship, including the type of communications between the parties and the Services provided. The Company is cautious and explicit when requesting the information that is necessary for the successful provision of the Services. Such information may include:

- Personal information (such as your name, physical address, email address and telephone number) which you provide to the Company by contacting its team, sending an email, or communicating with it in any other way. The Company uses that information to contact you regarding the provision of its Services.
- Invoicing information (such as your Company name, Vat number, currency, telephone, invoicing address, town, country, postal code, IBAN,) that you provide to the Company when you choose our services. We use such information to identify you, verify your purchase of our Services, and for invoicing purposes, as applicable.
- Profile and data regarding your specific needs. We collect such data in order for them to be used to personalize our Services and any requested service in a way that is more relevant to you.
- Marketing preferences, or responses to voluntary customer satisfaction surveys (customer feedback). To improve our marketing communications, we may collect information about interaction with, and responses to, our marketing communications.

Specifically, the Company collects Personal Data aiming to:

- communicate with you providing you with customer care and support when needed.
- inform you regarding corporate news and services offered by the Company.
- offer and improve the quality of its engineering services.
- tailor its services aiming to meet your requirements, in the most appropriate manner.
- evaluate and analyse the market, its customers and its services.

- create statistical data and reports, for internal purposes.
- manage requests for deletion from update lists.
- create and manage questionnaires and statistics.
- prevent, detect and investigate crime, including fraud and money laundering, and analyse and manage other commercial risks.
- comply with applicable laws and regulatory obligations (including laws and regulations outside your country of residence), comply with legal processes and court orders and respond to requests from public and government authorities (including those outside your country of residence).

Moreover, the Company will:

- ensure that the legal basis for processing personal data is identified in advance and complies with the law.
- not use personal data contrary to the content of this policy and the fair processing principle or (client & employee) privacy notice.
- ensure that appropriate privacy notices are in place advising staff and other third parties how and why their data is being processed, and, in particular, advising data subjects of their rights.
- only collect and process the personal data that it needs for purposes it has identified in advance.
- ensure that, as far as possible, the personal data it holds is accurate, or a system is in place for ensuring that it is kept up to date as far as possible.
- only hold into personal data for as long as it is needed, after which MP will securely erase or delete the personal data.
- ensure that appropriate security measures are in place to assure that personal data can only be accessed by those who need to access it and that it is held and transferred securely.

Last but not least, the Company will make sure that all staff (employees, freelance etc.) who handles personal data on its behalf is aware of their responsibilities under this policy and relevant data protection and information security policies, and that they are adequately trained and supervised. Breaching this policy may result in disciplinary action for misconduct, including dismissal. Obtaining (including accessing) or disclosing personal data in breach of the Company's data protection policies may also be a criminal offence.

VI. Legal grounds for the processing of Personal Data

The processing of Personal Data is taking place on one of the following legal grounds: **(a)** the terms of our contractual relationship in the context of its materialization, **(b)** the consent of the subject, where required, **(c)** the legal obligations of the Company (e.g. tax, labor, social security legislation),

(d) the legal interest of the Company.

VII. Data Subject Rights

The Company ensures that it can facilitate any request made by an individual to exercise their rights under data protection legislation. The Company's staff is aware of data subjects' rights. Staff can identify such a request and knows who to handle it. In particular, the data subject rights can be summarized as follows:

Subject access: the right to request information about how personal data is being processed, including whether personal data is being processed and the right to be allowed access to that data and to be provided with a copy of that data along with the right to obtain the following information:

- The purpose of the processing.
- The categories of personal data.
- The recipients to whom data has been disclosed or which will be disclosed.
- The retention period.
- The right to lodge a complaint with the Hellenic Data Protection Authority.
- The source of the information if not collected directly from the subject, and
- The existence of any automated decision-making.

Rectification: the right to allow a data subject to rectify inaccurate personal data concerning them.

Erasure: the right to have data erased and to have confirmation of erasure, but only where:

- The data is no longer necessary in relation to the purpose for which it was collected, or
- Where consent is withdrawn, or
- Where there is no legal basis for the processing, or
- There is a legal obligation to delete data.

Restriction of processing: the right to ask for certain processing to be restricted in the following circumstances:

- If the accuracy of the personal data is being contested, or
- If processing is unlawful but the data subject does not want it erased, or
- If the data is no longer needed for the purpose of the processing but it is required by the data subject for the establishment, exercise or defense of legal claims, or
- If the data subject has objected to the processing, pending verification of that objection.

Data portability: the right to receive a copy of personal data which has been provided by the data

subject and which is processed by automated means in a format that will allow the individual to transfer the data to another data controller. This would only apply if MP was processing the data using consent or based on a contract.

Object to processing: the right to object to the processing of personal data relying on the legitimate interests processing condition unless MP can demonstrate compelling legitimate grounds for the processing that override the interests of the data subject or for the establishment, exercise or defense of legal claims.

In order to exercise the abovementioned rights you may submit a request to the Company's postal address or e-mail address: gr8-geo@gr8-geo.com, under the heading "Data" and we will assess it and answer you as soon as possible. All requests will be considered without undue delay and within one month of receipt as far as possible.

VIII. Organizational and technical measures

The Company has taken organizational and technical measures to protect the data that it collects in relation to its Services, especially sensitive Personal Data. The Company's IT department implements international standards and practices to ensure the safety of networks and the encryption of data.

The Company as well as any data's processors have accepted: **(a)** not to disclose data, **(b)** not to transfer to third parties Personal Data without the required consents and/or approvals, **(c)** to take the appropriate technical measures, **(d)** to follow the legal framework for the protection of personal data and the Regulation 679/2016/EE.

However, please bear in mind that despite the reasonable measures that the Company undertakes in order to protect your information, no website, internet transmission, computer system or wireless connection is ever completely safe.

IX. Personal Data storage

The Company undertakes reasonable measures to ensure that your personal data will be stored no longer than needed for the purpose, for which it has been collected, and no longer than required by the contract or the applicable legislation.

X. Duration of Personal Data retention

The Company retains the Personal Data only for the period required for the fulfillment of the scope

for which you have provided it with your Personal Data and in compliance with the respective legislation as in force. If a shorter retention period is not foreseen, the minimum retention period for Personal Data shall be five (5) years.

XI. Applicable law - Personal Data Protection Authority

Applicable Law is the Greek Law as formulated in accordance with the General Regulation on the Protection of Personal Data 2016/679/EU and in general the current national and European legislative and regulatory framework for the protection of personal data. Competent Courts for any disputes arising in connection with your Personal Data are the competent Courts of Athens.

In any case, you have the right to file a complaint with the Personal Data Protection Authority (post address: Kifissias 1-3, PC 115 23, Athens, tel. 210 6475600, e-mail address: contact@dpa.gr) if you believe that processing of your Personal Data violates the applicable national and regulatory framework for the protection of Personal Data.

The Hellenic Data Protection Authority is a constitutionally established independent public authority, which has as its mission the supervision of the application of the General Data Protection Regulation (GDPR), national laws 4624/2019 and 3471/2006, as well as other regulations concerning the protection of the individual from the processing of personal data.

XII. Updates

This policy may be amended from time to time. To ensure that you are aware of any changes, please check this policy on a regular basis, especially before submitting a request to the Company for the provision of its services. The most recent version of the privacy policy will always be available here: <https://www.gr8-geo.com/company>.