

PRIVACY NOTICE

Information on personal data processing

The company under the name “**SOULIS – CHAIKALIS & CO. LTD.**” (“**ARISTEON**”) takes into serious consideration the lawful processing, security and protection of your personal data, regardless of the capacity under which you may be working with or contacting our company (whether a potential or a current customer, a business associate, an employee, a provider, a website visitor, a private individual or a third party in general that works with or contacts the company). Being a Data Controller ARISTEON is committed to implementing all regulations concerning the protection of personal rights and freedoms with regard to the processing of personal data, in compliance with the General Data Protection Regulation 679/2016 (GDPR), the Greek legislative framework in force and the decisions of the Hellenic Data Protection Authority (HDPa).

With this Privacy Notice the company wishes to inform you as to how we use and process your personal data, as well as on your rights as data subjects.

1. Who is responsible for Data Processing?

The company under the name:

“SOULIS – CHAIKALIS & CO. LTD.”

(hereinafter “ARISTEON”)

Registered offices: Lithakia, P.C. 29092, Zakynthos, Greece

2. What is personal data and which types of personal data ARISTEON collects?

Personal data means any information found in either printed or electronic form that may lead itself or in combination with other information to the identification/ verification of the identity of a natural person.

In connection with its business activities and transactions, ARISTEON collects the following personal data:

- Your identity data, such as name and surname, father's name, mother's name, address (residence and email address), phone number (fixed and mobile) etc.
- Data of the producers, such as occupation/ condition, entry to normal or special VAT arrangements or other tax arrangements, extent and crop location, number of trees, type of crop (conventional / organic), OSDE declaration, harvested olives production, characteristics and properties of olive oil (PGI, variety, acidity), etc.
- Data concerning the employees of the company, such as Social Security Number (AMKA), Number of ID, family data, number and age of children, citizenship, data on salaries/ allowances/ bonus, CVs, working experience, education, diplomas, leaves as well as information regarding the payment and taxation of the employees.
- Commercial and financial data, such as Tax Identification Number, Tax Authority, payment/ billing information, business information, bank account number, business address, information about previous transactions or commercial contracts/agreements, etc.
- Image capture and processing via video surveillance system.

Processing of special categories of personal data: ARISTEON does not collect or use personal data relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs or trade-union memberships, genetic or biometric data for the purpose of uniquely identifying you as a data subject, as well as data concerning your health, your sex life or your sexual orientation.

The company may exceptionally collect and process the above data if:

- you have given your explicit consent to the processing of those personal data for one or more specified purposes,
- processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the company or you as a data subject (e.g. in the fields of employment, social security and social protection law),
- the personal data are manifestly made public by you,
- processing is necessary to protect your vital interests where you are physically or legally incapable of giving consent,
- processing is necessary for the assessment of the working capacity of an employee (e.g. ability to operate machinery) or for raising

awareness and developing the appropriate working conditions for people with disabilities or special needs.

2. Is ARISTEON entitled to process your personal data?

ARISTEON is entitled to collect and process your personal data in the following circumstances:

- within the framework of our contractual relation, where data processing is necessary for the performance of a contract or in order to take steps prior to entering into a contract,
- for compliance with a legal obligation to which the controller is subject,
- with your explicit consent. This consent should be given by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of your agreement to the processing of personal data relating to you. The consent may be either in the form of a written statement, including electronic means, or oral statements. We shall not consider silence or inactivity to be a consent.

3. Purposes for which we will process your personal data

In compliance with applicable law, our contractual relation, or your explicit consent we process your personal data for the following purposes:

- **For developing, performing and fulfilling our contractual agreement**
- **For your support/service with regard to our company's services/products.**
- **For safeguarding the quality of our services, or the company's internal function**, as for example for the physical safety and protection of persons and property (e.g. video surveillance), for compliance with a company's legal obligation deriving from the current legislative and regulatory framework.
- **For marketing purposes.** We may process your personal data so as to inform you (via email or SMS) about products, services, seminars, events, actions or educational programs of our company that may be of interest to you or your business. We use your personal data for promoting you our services and products only with your consent (opt – in), and you have the right to oppose to the processing of your personal data for marketing purposes at any time (opt-out).

4. How long we retain your Personal Data?

ARISTAION will retain your Personal Data:

(i) for the time required to meet the objectives set out above, namely:

A. If the processing is necessary for the execution of a contract whose data subject is a party, the company keeps your data throughout the contractual relationship between us and for a period of five (5) years from the last calendar day of the end of the year since the end of your relationship with our company, for a possible future cooperation / contact. At this time, you have the right to disagree with the use of your Personal Data and request the deletion of your data from our company. Exceptionally, the company keeps your data beyond the above-mentioned time if it has a legitimate interest or a legal obligation to do so or whenever your Personal Data is required so that the company can claim or defend itself against legal claims.

B. Where processing is necessary to comply with a legal obligation of the data processor as long as the legal obligation exists for us or, as specifically defined by law, for as long as the obligation to keep certain data is legally enforceable.

(ii) If your data is processed after your consent, until you withdraw your consent. You have the right to withdraw your consent at any time. However, withdrawal of consent does not affect the lawfulness of treatment based on consent prior to its withdrawal.

You can withdraw your consent at any time by sending an e-mail to sxoil@otenet.gr or by calling +30 26950 52888.

In the event of withdrawal, if the use of an ARISTAION service requires your prior consent, the company will no longer be able to provide you with the relevant service.

5. Why should I provide you with my personal data?

As a general principle, providing us with your consent and any Personal Data under the present notice is completely voluntary. Therefore, there will not be any harmful effects if you choose not to provide us with such consent or Personal Data. There may be certain occasions, however, where ARISTAION will not be able to take action unless provided with specific Personal Data, when these data are essential, for instance, for the rendering of our services or for a fast and effective customer service. Unfortunately, in such circumstances, ARISTAION will not be able to provide you with what you require without your Personal Data.

6. How does ARISTAION process my Personal Data?

Our company as well as our employees, who are trained in personal data related matters, complies with the processing principles set out in the General Data Protection Regulation 679/2016 (lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality).

In any case we take the necessary organisational and technical measures to ensure that your personal information is transferred, stored and processed in accordance with the appropriate standards and safety procedures and in compliance with the terms of the present Policy Notice and the current legislation on data protection.

7. What are your rights when you provide us with your data?

ARISTAION is committed to respecting the confidentiality of your personal data and to ensuring that you are able to exercise your rights easily. You may contact us, without charge, via email at sxoil@otenet.gr or by calling +30 26950 52888 stating the reasons to your request and the right you wish to exercise.

In particular and regardless of the purpose, or the legal framework under which we process your data, you have the following rights:

1. The right to request access and to be informed of the personal data that we hold about you (right of access).
2. To request correction of your data in order for such data to be correct and accurate (right of rectification).
3. To ask for the deletion of your personal data, without prejudice to the company's obligation and legal rights, as set out above (right to erasure, right to be forgotten).
4. To request for restriction of the processing of your data (right of restriction).
5. To request the receipt of the personal data you have provided the company with in a structured, commonly used, machine-readable format, in order to transfer it to a third party you have chosen without us objecting to such a transfer (right to portability).

6. To object to the processing of your personal data on the basis of your legitimate interests (right of objection).

Right to make a complaint. If you feel that your personal data has not been processed by ARISTAION in accordance with the present notice or in a manner that does not meet the applicable EU data protection regulation, you have a specific right to lodge a complaint at any time with the relevant supervisory authority of the EU country you reside in, or the Hellenic Data Protection Authority. In addition, refusal of the company or undue delay in delivering your demands in exercising your rights, gives you the right to file a complaint with the Data Protection Authority, as competent supervisory authority.

Data Protection Authority Offices: Kifissias Str. 1-3, P.C. 115 23, Athens, Call Center: + 30-210 6475600, Fax: + 30-210 6475628, Email: contact@dpa.gr.

8. Do we share your data with third parties?

We may share your personal information with third parties only under the terms of this privacy policy and in particular:

- (a) when it is required or approved by law or at the request of any public authority (governmental or other competent authorities),
- (b) When it is necessary to provide you with services that you have requested, in which case you will have been informed and given your consent (for example a shipping company to send our products to you or to olive oil trading companies when we are mediating to facilitate your transaction between you and the trading company).
- (c) To service providers and processors that we use to provide and improve our services and support our business.

9. Changes to this privacy notice

We may modify the information in this Privacy Notice, when deemed necessary. In such a case, you will be notified accordingly, so that you have the ability to review, evaluate or even object to these changes and ask to be deleted from a service or operation. We recommend that you regularly check for changes in the privacy notice that is always posted on our website. This website may contain links to other websites. ARISTAION is not responsible for the privacy practices or content of other websites that we do not control.

Therefore, we strongly advise you to read the privacy terms of the aforementioned websites.