

Personal Data Collection, Use and Processing Policy of A. Hatzopoulos S.A.

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1. Introduction

A.HATZOPOULOS S.A. are committed to ensuring the privacy and protection of personal data collected from their current and former partners, when they are natural persons, as well as data collected from the employees of their partners and suppliers, within the framework of processing data and executing contracts, and for the purpose of meeting not only their own obligations and legitimate interests, but also those of their partners. This Policy applies to personal data of natural persons of former and current partners and suppliers, as well as those of their employees, and the processing of those data in any form – verbally, electronically or in written form.

This Policy implements the commitment made by A.HATZOPOULOS S.A. for the protection of your personal data for

- a) partners and suppliers,
- b) customers,
- c) marketing and communication purposes,
- d) the website www.hatzopoulos.gr
- e) the visitors of the company's sites

and their processing in any form – verbally, electronically or in written form.



Please study this policy in order to understand and have full knowledge of its contents and your rights. The processing and protection of your personal data subject to the terms of this policy, as well as to the EU's General Data Protection Regulation 679/2016 (GDPR) and other provisions under national, Community and international law on the protection of individuals with regard to the processing of personal data, as applicable.

Any possible future modification or adjustment shall become subject to this policy, which will be amended accordingly and you shall be further notified. In any case, A.HATZOPOULOS S.A. retains the right to change the terms of protection of personal data, in accordance with the current legal framework and update of this policy.

2. Your personal data – what are they?

“Personal data”: are 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. Personal data relate only to natural persons and they can identify a natural person, either directly and individually, or in conjunction with other information that is in the possession of the data controller. The processing of personal data is regulated by the General Data Protection Regulation 2016/679 and other relevant national and European legislation.

3. Who we are

A.HATZOPOULOS S.A. are the data controller for all the personal data they collect, as stated in Section 1. This means that they decide how the processing of your personal data is carried out, as well as the reasons for processing that data.

3.1 Personal data for the website www.hatzopoulos.gr

The website of A.HATZOPOULOS S.A. is being hosted and maintained by the company Social Mind, which have the role of data processor with respect to this service, whatever this may mean for the obligations of the involved parties.

4. How we process your personal data

A.HATZOPOULOS S.A. in compliance with the GDPR requirements, process your personal data in lawful, fair and transparent ways, ensuring the legality, objectivity and transparency of the process. Data is collected for specific, explicit and legitimate purposes and they are not being processed in a manner that is incompatible with those purposes. Only data that are necessary and appropriate for processing purposes are collected. No more data than necessary are collected. It is ensured that updated data are maintained for their accuracy or their erasure and their amendment when they are inaccurate, considering the purposes of their processing. Data are maintained for as long as necessary for the purposes of processing and then their safe destruction is ensured. The protection of personal data from loss, misuse and abuse, unauthorised access and leaking of information is ensured, as well as the fact that appropriate technical and organizational measures are taken for their protection.

Your personal data are processed for purposes relating to staff administration and management and for purposes relating not only to the company's activities and legitimate interests but also to those of its partners.



In particular, A.HATZOPOULOS S.A. processes personal data for the following legal, transparent and documented individual purposes:

4.1 Personal data for partners and suppliers

- 1) Use of ERP (Enterprise Resource Planning) systems, where contracts, purchases/commissions or payments are recorded for accounting purposes, tax compliance measures and any other obligations.
- 2) Procedures required by law (European and national), due to the nature of the company's activities and the strict safety measures to be followed (for example, food safety reports, inspections and reports regarding entering and exiting production sites and facilities, and environmental issues).
- 3) Keeping records and files within the framework of the company's implementation procedures, control and quality systems, as well as safety measures so that quality, efficiency and safety in production and day-to-day operations in general are ensured.
- 4) Use of control and monitoring systems (cameras, closed circuits, entry and exit control).
- 5) Archive of cooperation agreements.
- 6) Procedures relating to the company's product promotion and services, public relations and communication.

4.2 Personal data for customers

- 1) Use of ERP (Enterprise Resource Planning) systems, where contracts, orders, sales, purchases/commissions or payments are recorded for accounting purposes, tax compliance measures and any other obligations.
- 2) Procedures required by law (European and national), due to the nature of the company's activities and the strict safety measures to be followed (for example, food safety reports, inspections and reports regarding entering and exiting production sites and facilities, and environmental issues).
- 3) Recording of requests, problems or customer complaints.
- 4) Internal reports concerning the monitoring of customers and contracts.
- 5) Keeping a record of contact persons for the purpose of expediting the procedures within the framework of executing contracts.
- 6) Procedures relating to the company's product promotion and services, public relations and communication.

4.3 Personal data for marketing and communication purposes

- 1) Use of email/newsletters for the promotion of products and services, communication and public relations.
- 2) Keeping a contact record of the company's sales department in order to attract and maintain clientele, as well as communicate with the customers.
- 3) Using a customer relationship management system (CRM).
- 4) Maintaining a website.
- 5) Use of social media networks.
- 6) Keeping questionnaire, evaluation and attendance records from events, presentations and company activities.
- 7) Customer satisfaction records, evaluation of services and optimisation or identification of further requirements.
- 8) Keeping a photographic and audiovisual record of events, presentations and company activities.

4.4 Personal data for the website www.hatzopoulos.gr

The website collects your personal data only if you wilfully provide them by visiting it or by making use of the features it provides.

The web page may collect user identification data by automated means or by using technologies such as cookies and/or Internet Protocol (IP) address tracking. Cookies are small text files that are stored in each visitor's hard disk drive and they do



not acknowledge any documents or files that are stored in the computer. They are used to facilitate visitors' access to certain services and/or web pages, for statistical purposes and in order to identify useful or popular areas. That data may also include the visitors' browser type, computer type, operating system, internet service providers and other information of this kind. In addition, their information system automatically collects information about the sites visited by the user and about links on third party websites that the user may choose through its use.

Visitors may configure their web browser so as to be informed of the placement of cookies or to always reject the use of cookies. In the event that visitors/users of such services and web pages do not wish to use cookies for their identification, they will not have further access to those services.

Below is a list of cookies we use on our web page for your information.

Cookies name	Cookies provider	Purpose	Detailed information and expected lifespan
Cookies starting with _ut* και _ga, _gid, _gat, AMP_TOKEN, _ga_exp, _gac_*	Google Analytics, Google AdWords, Google DoubleClick, Google Optimize	These are web analytics cookies provided by Google Inc. They are used to collect information about how visitors use the website. This information is used for the collection of statistical data from the users (e.g. country of origin, time spent on the web page). These cookies may also be used to provide users with a tailored and personalised advertising experience.	Google Analytics and DoubleClick/AdWords services privacy policy.
PHPSESSID		Stores the user's Session ID.	It is deleted when you close your web browser.
language	Hatzopoulos	Stores the language the users have selected, so that all pages open directly to the selected language without having to change it every time.	150 days

If links to other websites, which are under the responsibility of third parties (natural or legal persons) are included on the web page, then the web page is by no means responsible for the terms of personal data protection that these websites subject to. The web page may process a part or all of the data sent by the visitors for statistical purposes by using Google Analytics. For more information about Google Analytics' terms of use, please refer to their policy.

In case you fill in the contact form on the website, your personal data (surname, name, email) are not collected, but they are sent to a company email address and are used solely for replying to your query. For any other kind of processing (e.g. company



updates, newsletter) your explicit consent will be required. In order to submit the said contact form, you give your consent according to what is stated in the relevant section.

4.5 Submission of curriculum vitae (CV)

You may submit your curriculum vitae (CV) to A.HATZOPOULOS S.A. You can submit it in printed form or in electronic form at the email address hr@hatzopoulos.gr or in electronic form of the website www.hatzopoulos.gr. By submitting your CV you consent to the processing of your personal data, according to the terms provisioned in any relevant process or section. The retention period of your CV is 5 years from its submission date, in any case. Once this period has passed, it is deleted. In case you withdraw your consent earlier, your CV will be deleted accordingly.

5. Legal basis for processing

5.1 Personal data for partners and suppliers

For the purposes of 1 and 2 (Section 4.1), the legal basis for processing is a legal obligation: Processing of your personal data is necessary for the compliance with the legal obligation of A.HATZOPOULOS S.A., namely obligations stemming from the law. In the event that necessary data are not processed then this would constitute a violation of the law, corresponding penalties, as well as poor service.

The legal obligation derives from the sum of taxation and insurance law, as it applies, and is enriched, amended or clarified by provisions, circulars and circular numbers, whilst, where applicable, obligations may be imposed by the law governing each contract.

Furthermore, legal obligations in certain cases arise from national and European law, which imposes specific control and security measures due to the nature of the company's subject matter.

For the purposes 3-5 (Section 4.1), the legal basis for processing are the legitimate interests of A.HATZOPOULOS S.A. or those of third parties (customers or employees): The processing of your personal data is necessary for the purposes of the legitimate interests pursued by A.HATZOPOULOS S.A. Namely, A.HATZOPOULOS S.A., invest in long-term relationships and partnerships. They invest in their partners and in high value-added services. For this reason, they evaluate their partners, ensuring the application of appropriate safeguards. Furthermore, A.HATZOPOULOS S.A., operate in an area associated with increased requirements in terms of security, quality and control. They have a clientele that includes a large number of companies in Greece and abroad and they hold a significant share of the market they target. They aim to create a basis for the continuous improvement of their process efficiency, taking into account the continuous satisfaction of the needs and expectations of their customers to the greatest extent possible, and to minimise the number of incidents that may affect the continuity of business processes, as well as the reduction of their impact. For this reason, they take increased security measures and implement ISO standards – following specific procedures regarding the management of their human resources and their products, in order to ensure not only security but also quality.

Individual forms of processing are carried out within the aforementioned legitimate interests. An interruption of the aforementioned processing would lead to the loss of quality and security assurance schemes, quality reduction of the provided services, as well as reduced job satisfaction and security.



For purposes relating to communication and marketing there is a special policy, which you can carefully study regarding the terms and your rights, and you shall receive a separate notification about it if it concerns you. In the event of a new processing form not covered by the above, we shall inform you again or ask for your consent.

5.2. Personal data for customers

For the purposes of 1 and 2 (Section 4.2), the legal basis for processing is a legal obligation: Processing of your personal data is necessary for the compliance with the legal obligation of A.HATZOPOULOS S.A., namely obligations stemming from the law. In the event that necessary data are not processed then this would constitute a violation of the law, corresponding penalties, as well as poor service.

The legal obligation derives from the sum of taxation and insurance law, as it applies, and is enriched, amended or clarified by provisions, circulars and circular numbers, whilst, where applicable, obligations may be imposed by the law governing each contract.

Furthermore, legal obligations in certain cases arise from national and European law, which imposes specific control and security measures due to the nature of the company's subject matter.

For the purposes 3-4 (Section 4.2), the legal basis for processing are the legitimate interests of A.HATZOPOULOS S.A. or those of third parties (customers or employees): The processing of your personal data is necessary for the purposes of the legitimate interests pursued by A.HATZOPOULOS S.A. Namely, A.HATZOPOULOS S.A., invest in long-term relationships and partnerships, in providing high value services and in integrated solutions for their customers. For this reason, they wish to have full supervision of the course of the contracts, to monitor the work and customer satisfaction in each stage, to monitor the effectiveness of their people and to improve. In order to achieve the above objectives, they apply evaluation and monitoring procedures, which ensure that the same mistakes are not repeated, the delays are minimised and ISO standards are easily implemented.

An interruption of the aforementioned processing would lead to the loss of quality and security assurance schemes, quality reduction of the provided services, as well as reduced job satisfaction and security.

For the purpose of number 5 (Section 4.2), the processing of your personal data is carried out within the framework of executing contracts concluded with HATZOPOULOS S.A.'s customers, as keeping a record of contact persons facilitates the procedural part of deliveries/pickups and executions of contracts in general.

For purposes relating to communication and marketing there is a special policy, which you can carefully study regarding the terms and your rights, and you shall receive a separate notification about it if it concerns you. In the event of a new processing form not covered by the above, we shall inform you again or ask for your consent.

5.3. Personal data for marketing and communication purposes

For all the reasons excluding clauses 2 and 3 (Section 4.3) (they are given in the following paragraph), the processing of your personal data is only performed on the basis of specific, free and informed consent after you have been informed about the terms of this policy. Within the frame of the company's compliance with GDPR, the process of obtaining explicit, valid and legal consent for the aforementioned purposes is repeated through the completion of forms that regulate individual actions and activities. Please note that for any new purpose of processing that is not included in these forms, A.HATZOPOULOS S.A. shall request you to resubmit you consent.



In order to retain a contact record from the sales department, so that communication between potential, current and former clients can take place, as well as in order to use the customer management system, the legal basis of the processing are the company's legitimate interests, as they are already published data (mainly on websites), or data that have been provided within the framework of an existing cooperation. If these data are to be used for any purpose other than those described in this or a future policy, your consent shall be requested.

5.4. Personal data for the website www.hatzopoulos.gr

For the reasons stated in Section 4.4, the processing of your personal data is only performed on the basis of specific, free and informed consent after you have been informed about the terms of this policy, through your visit to the website.

6. Consent

In cases where data processing is performed on the basis of your consent with respect to the criteria laid out above and by filling out the respective forms, a copy of the issued statement is retained, which contains all information included therein as proof of your consent for the sake of facilitation in case the consent is withdrawn. The consent is given for clear and distinct purposes, which have been communicated to you and the moment you give your consent you have full knowledge of what you are consenting to.

You can withdraw your consent at any time, by following the process described. The withdrawal of your consent does not affect the lawfulness of the processing based on the consent before its withdrawal.

7. Consent of minors

The terms of this policy for the purposes of processing contained therein and obtaining the consent where applicable are valid for minors who are at least 16 years old.

In any other case, the consent – when required – is given or authorised by the holder of parental responsibility over the child. In order to fully verify the age of the person or those who have parental responsibility, the submission of the consent serves as a solemn declaration.

8. Submitting requests – Exercising your rights

In order to exercise your rights as described in this policy you may submit a request. A.HATZOPOULOS S.A. are committed to responding and providing the relevant information without delay within one month upon receipt of the proven request. The said period can be extended further by another two months, if necessary, depending on the complexity of the request and the number of requests. In this case, the applicant shall be informed within one month upon receipt of the proven request. Failure to respond within the set period of time the applicant will be informed of the reasons within one month upon receipt of the proven request.

Requests are checked for their size and repeatability per applicant for potential abuse, in order to give A.HATZOPOULOS S.A. the rights of art. 12 par. 3 of GDPR. Requests are accepted only in written form, by sending an email to dpo@hatzopoulos.gr or by registered post to the company's registered office:

A.HATZOPOULOS S.A.
Data Protection Officer
21, Stadiou Str., 57009, Kalohori
Thessaloniki, Greece

Your request must include clear wording, your full name and exact contact information (email, telephone number, address).



9. Sharing your personal data

Your personal data are treated with full confidentiality and security and they are not shared further, except where disclosure is required, or due to reasons of force majeure.

9.1. Personal data for partners and suppliers

Your personal data may be disclosed by law to public services, social security institutions, as well as individuals directly related to A.HATZOPOULOS S.A. (for example, accountants, lawyers, IT or support companies, partners or customers) within the framework of day-to-day business and not only the legitimate interests A.HATZOPOULOS S.A., but also of yours.

Furthermore, A.HATZOPOULOS S.A.'s ERP system is supported by OROSIMO Software S.A. In such cases, A.HATZOPOULOS S.A. verify the existence of relevant safeguards required for the secure management of personal data that is likely to take place by their partner and they take all the necessary measures in order to ensure the secure management of the data. The same applies in the event of a relevant future cooperation.

9.2. Personal data for customers

Your personal data may be disclosed by law to public services, social security institutions, as well as individuals directly related to A.HATZOPOULOS S.A. (for example, accountants, lawyers, IT or support companies, subcontractors, partners or customers) within the framework of day-to-day business and not only the legitimate interests A.HATZOPOULOS S.A., but also of yours. If part of the work undertaken by HATZOPOULOS S.A. is allocated to a third party, the measures provided by GDPR (art. 28) are applied and you are also informed. Furthermore, A.HATZOPOULOS S.A.'s ERP system is supported by OROSIMO Software S.A. In such cases, A.HATZOPOULOS S.A. verify the existence of relevant safeguards required for the secure management of personal data that is likely to take place by their partner and they take all the necessary measures in order to ensure the secure management of the data. The same applies in the event of a relevant future cooperation.

9.3. Personal data for marketing and communication purposes

A.HATZOPOULOS S.A. use your data solely for the purpose for which they are described in this policy and for their own use and there is no interconnection of means or linking of data. We shall communicate with you via the Mailchimp platform, which gives you the rights provided by the Regulation, in correlation with this policy and as soon as you consent to our communication via Mailchimp you subject to the terms of use of the platform, which we recommend that you study.

The same applies to any future replacement of the particular platform by another. The same applies to cases of customer survey, where the SurveyMonkey platform is used, considering a possible future replacement.

9.4. Personal data for the website www.hatzopoulos.gr

A.HATZOPOULOS S.A. use your data solely for the purpose for which they are described in this policy and for their own use and does not sell or transfer in any way or publicise users'/visitors' personal data to third parties.

10. Retention period of personal data

Your personal data are not kept for longer than the reasonable amount of time that is required for the purpose of their individual processing and there are certain criteria that determine it. In cases where the processing of your personal data is based on a legal obligation, the time period of data retention is determined in accordance with the requirements of the law, the time period during which competent authorities can carry out inspections, the provided limitations, as well as your legal interests.



In cases where the processing is based on the legitimate interests of A.HATZOPOULOS S.A., the time period of data retention is determined by each processing purpose and for a reasonable period of time, so that effectiveness, traceability and the documentation of the procedures are ensured and, in any event, for the duration of the contracts and the legal obligations that arise from them.

The exact data retention periods for each processing activity are recorded in the register of processing operations kept by A.HATZOPOULOS S.A. in accordance with the GDPR requirements. If you wish to receive more detailed information you may submit a request in accordance with the procedure provided by this policy.

11. Your privacy rights

You as a data subject have rights in respect of personal data we hold concerning you, subject to certain exceptions set out in the Regulation and all relevant legislations.

- 1) You have the right to request a copy of all personal data we hold relating to you. In particular, you have the right to receive confirmation of whether your personal data are being processed or not, and if that is so then you have the right to be informed about the following:
 - a) the purposes of the processing;
 - b) the categories of personal data concerned;
 - c) the recipients or categories to whom personal data have been or will be disclosed, especially recipients in third countries or international organisations;
 - d) where possible, the envisaged period for which the personal data shall be stored or, if not possible, the criteria used to determine that period;
 - e) the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data or to object to such processing;
 - f) the right to lodge a complaint with a supervisory authority;
 - g) information about the origin of your personal data, if acquired from a third party;
 - h) the existence of automated decision-making, including profile and information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject;
- 2) You have the right to request correction of your personal information, if it is found to be inaccurate, or to fill in incomplete data.
- 3) You have the right to request the erasure of your personal data where one of the following grounds applies:
 - a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - b) you have withdrawn the consent which the processing is based on and there is no other legal ground for the processing;
 - c) you object to the processing of your personal data and there are no overriding legitimate grounds for the processing;
 - d) the personal data have been unlawfully processed;
 - e) the personal data must be erased for compliance with the legal obligation in the Union or Member State law to which we are subject;
 - f) the personal data have been collected in relation to the offer of information society services;
- 4) You have the right to withdraw your consent to the processing of your personal data at any time, in cases where we process your personal data based on your consent.



- 5) You have the right to request us to deliver your personal data or to transmit your personal data directly to another controller, in case where your data are being processed based on a consent or within the framework of an agreement.
- 6) You have the right to request a restriction of further processing of your personal data in the following cases:
 - a) if you doubt the validity of the personal data, over a period of time that would allow us to verify the validity of the personal data;
 - b) if the processing is illegal and you want to restrict the processing of personal data instead of erasing them;
 - c) if the purpose of processing has been achieved but you wish to impose restrictions concerning legal claims.
 - d) if you have lodged an objection against the processing and it is not yet clear whether the legitimate grounds outweigh your grounds.
- 7) You have the right to oppose to the processing of personal data at any time and for reasons relating to your particular situation, including profiling, based on these provisions. All processing of your personal data shall cease once you withdraw your consent, unless there are compelling and legitimate reasons for the processing of personal data which outweigh the interests, rights and freedoms of the data subjects concerned or for the establishment, exercise or defense of legal claims.

The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

12. Transfer of personal data to third countries outside the EU or international organisations

For the purposes of processing, your personal data are not transferred to countries outside the EU, and if that happens you shall be further notified of any amendments to the policy with individual security measures and relevant safeguards.

13. Automated decision making

Your data are not subject to automated decision making, and if that happens you shall be further notified of any amendments to the policy with regards to the logic, significance and consequences of the processing for the individual.

14. Further processing of personal data

A.HATZOPOULOS S.A. have the ability to amend this policy whenever a change in its content that requires notification occurs. If A.HATZOPOULOS S.A. wish to use your personal data for a new purpose that is not covered by this policy, then this policy shall be communicated to you again prior to the start of processing, specifying the purposes and conditions of processing. Whenever and wherever needed, your prior consent shall be requested for the new processing.



15. Additional terms

A.HATZOPOULOS S.A. declare that they have taken all the necessary organisational and technical measures for the protection of your personal data and maintain an integrated security plan in accordance with the requirements of the Regulation.

The collection and processing of personal data within the framework of this policy are carried out in a lawful manner and in such a way as to ensure the respect of privacy, personality and human dignity. This policy is implemented within the framework of good faith and moral conduct and the free will of the parties, ensuring a good and efficient cooperation and the protection of everyone.

15.1 Personal data for marketing and communication purposes

Your explicit consent is requested for marketing and communications processing that takes place via email newsletters. For the promotion of our products and services, updates about the company's activities, communication and public relations that take place via social media networks used by the company, you can follow us with your consent, which you can withdraw at any time by interrupting the sequence. The use of social media networks by A.HATZOPOULOS S.A. comes with responsibility and rules. A.HATZOPOULOS S.A. and their people follow specific corporate rules in the context of using social media networks, ensuring the respect of the users' rights and personalities. A.HATZOPOULOS S.A. do not collect data of their users on social media networks for linking data and other processing purposes (e.g. addition to the customer relationship management application – CRM and profile creation), they do not export your data from social media networks in order for them to be used for other purposes, they do not use your data in social media for other marketing and communication activities, nor do they forward them to third parties. In order to process your personal data on individual social platforms, please read the terms of use and the privacy policies of each individual platform. Your personal data are processed solely on the basis of the terms set by each platform.

15.2. Personal data for the website www.hatzopoulos.gr

By visiting our website you acknowledge that you have read, have understood its contents and agree to its terms. It is recommended to periodically review this Policy for potential changes. Should you disagree with its terms, you should avoid visiting our website.

15.3. Enquiries – Clarifications – Complains

If you are unable to exercise the rights provided by the Regulation and in general, for enquiries including questions, clarifications and complaints, you have the right to contact the Data Protection Authority for assistance and support.

Contact Information:

Postal Address: Data Protection Authority

Offices: 1-3 Kifissias Avenue, 115 23, Athens

Call Centre: +30-210 6475600 | Fax: +30-210 6475628

Email: contact@dpa.gr

A.HATZOPOULOS S.A. are not responsible except for reasonably proven cases and where there is no force majeure or a justified delay. Furthermore, for any matter relating to your protection against processing of personal data, you have the right to submit a request in view of the above information, as well as the right to contact A.HATZOPOULOS S.A.'s designated Data Protection Officer (DPO) for any reason, by sending an email to the electronic address dpo@hatzopoulos.gr Your request must be clearly worded and include your contact details, as well as your full name.

