

Information on the processing of personal data

Updated: 6.2.2025

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The company "Athanasios Hatzopoulos Packaging Materials Industry S.A.", which is located in Kalochori, 21 Stadiou Street, Thessaloniki, Greece, with the registration number 094049563 (hereinafter the "Company", "we", "us", "our"), provides this website and is also responsible for its operation and management.

The Company hereby informs you about how it processes and protects your personal data (hereinafter the "Notice"), in its capacity as a controller (within the meaning of the GDPR), when you browse and use the website "<https://hatzopoulos.gr/>" (hereinafter the "Website") and when you communicate with us. Also available on the Website you will find the Notice on the processing of personal data through the use of trackers (hereinafter the "Tracker Notice"). By using the Website, you acknowledge and unconditionally declare that you have reviewed, understood and accepted all the terms contained in this Notice and the Tracker Notice. If you do not agree to any of these terms, you must refrain from browsing and using the Site.

The words "you" or "your" in this Notice are references to the persons whose personal data we process, i.e. users (natural persons who access, browse and use the Website e.g. for information purposes, to contact the Company, etc.).

In this Notice, "Personal Data" means information that allows you to be identified, directly or indirectly, and in particular by reference to a certain identifier, such as your name, location data, a web identifier (e.g. IP address), etc.

We comply with the applicable legislation on the protection of personal data, including Regulation (EU) 2016/679 (General Data Protection Regulation - "GDPR"), Law 4624/2019, Law 3471/2006, as well as the directives and guidelines of the Data Protection Authority ("DPA") and the European Data Protection Board.

We may update this Notice from time to time (e.g. to reflect a change in our applicable legal framework or practices) and we will revise the date at the beginning of this Notice to reflect the date on which such update was made. You should check back frequently for updates. By accessing the



Site after the effective date of this Update, you are deemed to have reviewed and accepted our then-current Update.

1. Purpose of processing and legal basis

We process your Personal Data where there is a legal basis for such processing, only if and when at least one of the following conditions applies:

- - the processing is necessary to take steps at your request prior to the conclusion of a contract (i.e. when you browse the website, when you submit your CV for a specific job and when you are an associate of the Company so that we can give you access to certain data after you log in to the Website) (Contract),
- - processing is necessary for the purposes of legitimate interests pursued by us or a third party, unless those interests are overridden by your interests or fundamental rights and freedoms that require the protection of your Personal Data; for example, such legitimate interests include: a) monitoring how you use the Website in order to ensure its effective and secure operation, as well as to identify and prevent cases of fraud and abuse, b) the improvement of the functions and services of the Website, c) the answer to questions/requests when you contact us through the Website, d) investigate complaints made by filling in the complaint form and to evaluate your suggestions (Nominal interests)
- - the processing is necessary for compliance with a legal obligation of the Company, such as the provision of information to the competent authorities (e.g. the public prosecutor's office) and the investigation of reports falling within the scope of Law 4990/2022 (Legal obligation) and/or
- - you have consented to the processing of your Personal Data. This applies in particular when you ask us to contact you for marketing purposes or when you subscribe to newsletters, as well as for the use of certain cookies and tracking technologies (Consent).

2. Recipients of Personal Data

We outsource to external service providers, who act as processors on our behalf and in accordance with our instructions, the provision of certain services, including IT and systems management services, such as, but not limited to, marketing services, Website administration and support services.

To the extent necessary, we may disclose Personal Data to law enforcement authorities, government authorities, relevant independent regulatory/supervisory authorities, competent courts and other judicial authorities, our professional external advisors, including lawyers, auditors, accountants and insurers who provide us with relevant services. In the event of a merger or acquisition, your Personal Data may be disclosed to the third parties involved in the merger or acquisition. We may also disclose information about you in connection with a commercial transaction in which financing, investment or support is sought.

In the context of cooperation with the above recipients, any transfer of your personal data outside the European Economic Area ("EEA") to achieve the above processing purposes, by virtue of



their disclosure to them, will be based on an adequacy decision of the European Commission or subject to appropriate and adequate safeguards and conditions to ensure an adequate level of data protection, e.g. data transfer agreements based on standard contractual clauses approved by the European Commission. For more information on how the Company protects personal data when transferred outside the EEA or to obtain a copy of the safeguards we apply to protect personal data when transferred outside the EEA, please contact us at the contact details of the Company's Data Protection Officer: dpo@hatzopoulos.gr.

4. Retention period of Personal Data

Personal Data processed for the aforementioned purposes will generally be kept for as long as necessary to fulfil the purposes for which they were collected, e.g. for as long as it takes us to respond to your request. Once the purpose of the processing is fulfilled, we will delete or anonymise your Personal Data.

Regarding the retention of the data we collect through cookies and other trackers, please read our [Tracker Use Notice](#).

5. Security of Personal Data

Taking into account the latest technological developments, the implementation costs and the nature, scope, context and purposes of the processing, as well as the risks of varying likelihood and severity to the rights and freedoms of natural persons, we implement appropriate technical and organisational measures to ensure an appropriate level of security against processing risks.

6. Your rights

Under the conditions provided by law, you have the following rights regarding the protection of your Personal Data:

- **Right of access:** You can contact us to find out and receive an explanation as to whether we process Personal Data concerning you, the categories of such data and how we process them. You may also request a copy of your Personal Data that we process.
- **Right of correction:** If you believe that your data is inaccurate or incomplete, you have the right to request that it be corrected or completed.
- **Right to erasure:** In appropriate circumstances, such as when the data is no longer necessary, you can ask us to delete the data.
- **Right to restrict processing:** If you believe that your data is inaccurate or that the processing is unlawful or that we no longer need the data or you object to the automated process (where applicable), you have the right to request the restriction of processing.
- **Right to object:** You may object to the processing of your personal data on grounds relating to your particular situation, unless, inter alia, there are compelling legitimate grounds for the processing which override your interests, rights and freedoms. You also have the right to object where a decision concerning you is based solely on automated processing, including



profiling, and that decision produces legal effects or significantly affects you (statutory exceptions apply).

- **Right to data portability:** You have the right to receive personal data concerning you in a structured, commonly used and machine-readable format, and the right to transmit such data to another organisation (controller) that you indicate to us.
- **Right to withdraw consent:** You have the right to withdraw your consent at any time, without prejudice to the lawfulness of the processing based on your consent prior to its withdrawal.

You can find out further and more detailed information about your rights by visiting the website of the Data Protection Authority (www.dpa.gr). If you have any questions or concerns or wish to exercise your rights, please contact as indicated below.

7. Submission of a complaint

You have the right to lodge a complaint with the Hellenic Data Protection Authority regarding issues concerning the processing of your Personal Data by the Company. The Hellenic Data Protection Authority is located at Athens, Leof. Kifissias 1-3, P.O. Box 11523. More information on the responsibilities of the DPAA and how to file a complaint can be found at www.dpa.gr.

8. Contact with the Company

In order to contact the Company and/or to exercise your rights mentioned above, you can contact us here: dpo@hatzopoulos.gr

