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## **1**            **INTRODUCTION**

The **EU General Data Protection Regulation 2016/679 (“GDPR”)** comes into force across the European Union on 25<sup>th</sup> May 2018 and brings with it the most significant changes to data protection law in two decades. Based on privacy by design and taking a risk-based approach, the GDPR has been designed to meet the requirements of the digital age.

The 21<sup>st</sup> Century has brought broader use of technology, new definitions of what constitutes personal data, and a vast increase in cross-border processing. The new Regulation aims to standardize data protection laws and processing across the EU; affording individuals stronger, more consistent rights to access and control their personal information.

This Policy sets out the obligations of SCYTALYS S.A. (“the Company”) regarding data protection and the rights of its employees, employees’ relatives, candidates, suppliers, business partners, customers, customers’ employees and customers’ customers, in respect of their personal data under the GDPR.

The GDPR defines “personal data” as any information relating to an identified or identifiable natural person (a “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.

This Policy sets the Company’s obligations regarding the collection, processing, transfer, storage, and disposal of personal data relating to Company data subjects.

This Policy applies to all Company officers, directors, employees, agents, affiliates, contractors, consultants, advisors or service providers that may collect, process, or have access to data (including personal data and/or sensitive personal data). It is the responsibility of all of the above to familiarize themselves with this Policy and ensure adequate compliance with it.

The Company is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

## **2**            **DEFINITIONS**

a. For the purposes of this Policy:

- (1) “data subject” means an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to a personal identifier data;
- (2) “personal data” means any information relating to a data subject, 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;

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- (3) "Company data subject" means employees, employees' relatives, candidates, suppliers, business partners, customers, customers' employees and customers' customers;
- (4) "processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- (5) "restriction of processing" means the marking of stored personal data with the aim of limiting their processing in the future;
- (6) "profiling" means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements;
- (7) "pseudonymization" means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;
- (8) filing system' means any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographical basis;
- (9) "controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;
- (10) "processor" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- (11) "recipient" means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- (12) "third party" means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;
- (13) "consent" of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear

affirmative action, signifies agreement to the processing of personal data relating to him or her;

- (14) “personal data breach” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- (15) “genetic data” means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;
- (16) “biometric data” means personal data resulting from specific technical processing relating to the physical, physiological or behavioral characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;
- (17) “data concerning health” means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;
- (18) “binding corporate rules” means personal data protection policies which are adhered to by a controller or processor established on the territory of a Member State for transfers or a set of transfers of personal data to a controller or processor in one or more third countries within a group of undertakings, or group of enterprises engaged in a joint economic activity;
- (19) “supervisory authority” means an independent Hellenic Data Protection Authority (HDPa).

### **3 DATA PROTECTION PRINCIPLES**

- a. This Policy aims to ensure compliance with the GDPR. The GDPR sets out the following principles with which any party handling personal data must comply.
- b. All personal data must be:
  - (1) Processed lawfully, fairly, and in a transparent manner in relation to the data subject.
  - (2) Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
  - (3) Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
  - (4) Accurate and, where necessary, kept up to date. Every reasonable step must 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.
  - (5) 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. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, subject to

implementation of the appropriate technical and organizational measures required by the GDPR in order to safeguard the rights and freedoms of the data subject.

- (6) 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.

#### **4 THE RIGHTS OF DATA SUBJECTS**

a. The GDPR sets out the following rights applicable to data subjects (please refer to the Sections of this Policy indicated for further details):

- (1) The right to be informed (Section 13);
- (2) The right of access (Section 14);
- (3) The right to rectification (Section 15);
- (4) The right to erasure (also known as the 'right to be forgotten') (Section 16);
- (5) The right to restrict processing (Section 17);
- (6) The right to data portability (Section 18);
- (7) The right to object (Section 19); and
- (8) Rights with respect to automated decision-making and profiling (Sections 20 and 21).

#### **5 LAWFUL, FAIR, AND TRANSPARENT DATA PROCESSING**

a. The GDPR seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The GDPR states that processing of personal data shall be lawful if at least one of the following applies:

- (1) The data subject has given consent to the processing of their personal data for one or more specific purposes;
- (2) The processing is necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract with them;
- (3) The processing is necessary for compliance with a legal obligation to which the data controller is subject;
- (4) The processing is necessary to protect the vital interests of the data subject or of another natural person;
- (5) The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller; or
- (6) The processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

b. If the personal data in question is "special category data" (also known as "sensitive personal data" (for example, data concerning the data subject's race, ethnicity, politics, religion, trade union membership, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation), at least one of the following conditions must be met:

- (1) The data subject has given their explicit consent to the processing of such data for one or more specified purposes (unless EU or EU Member State law prohibits them from doing so);
- (2) The processing is necessary for the purpose of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment, social

- security, and social protection law (insofar as it is authorized by EU or EU Member State law or a collective agreement pursuant to EU Member State law which provides for appropriate safeguards for the fundamental rights and interests of the data subject);
- (3) The processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
  - (4) The data controller is a foundation, association, or other non-profit body with a political, philosophical, religious, or trade union aim, and the processing is carried out in the course of its legitimate activities, provided that the processing relates solely to the members or former members of that body or to persons who have regular contact with it in connection with its purposes and that the personal data is not disclosed outside the body without the consent of the data subjects;
  - (5) The processing relates to personal data which is clearly made public by the data subject;
  - (6) The processing is necessary for the conduct of legal claims or whenever courts are acting in their judicial capacity;
  - (7) The processing is necessary for substantial public interest reasons, on the basis of EU or EU Member State law which shall be proportionate to the aim pursued, shall respect the essence of the right to data protection, and shall provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject;
  - (8) The processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of an employee, for medical diagnosis, for the provision of health or social care or treatment, or the management of health or social care systems or services on the basis of EU or EU Member State law or pursuant to a contract with a health professional, subject to the conditions and safeguards referred to in Article 9(3) of the GDPR;
  - (9) The processing is necessary for public interest reasons in the area of public health, for example, protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of EU or EU Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject (in particular, professional secrecy); or
  - (10) The processing is necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes in accordance with Article 89(1) of the GDPR based on EU or EU Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection, and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

## **6 SPECIFIED, EXPLICIT, AND LEGITIMATE PURPOSES**

- a. The Company collects and processes the personal data set out in Sections 21 to 26 of this Policy.
- b. This includes:
  - (1) Personal data collected directly from Company data subjects;  
and
  - (2) Personal data obtained from third parties.
- c. The specific purposes for which the Company collects, processes, and holds such personal data are set out in Sections 21 to 26 of this Policy (or for other purposes expressly permitted by the GDPR).

- d. Company data subjects are kept informed at all times of the purpose and/or purposes for which the Company uses their personal data. Please refer to Section 13 for more information on keeping data subjects informed.

**7 ADEQUATE, RELEVANT, AND LIMITED DATA PROCESSING**

- a. The Company will only collect and process personal data for and to the extent necessary for the specific purpose or purposes of which Company data subjects have been informed (or will be informed) as under Section 6, above, and as set out in Sections 21 to 26, below.

**8 ACCURACY OF DATA AND KEEPING DATA UP-TO-DATE**

- a. The Company shall ensure that all personal data collected, processed, and held by it is kept accurate and up-to-date. This includes, but is not limited to, the rectification of personal data at the request of a Company data subject, as set out in Section 15, below.
- b. The accuracy of personal data shall be checked when it is collected and at twelve-month intervals thereafter. If any personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

**9 DATA RETENTION**

- a. The Company shall not keep personal data for any longer than is necessary in light of the purpose(s) for which that personal data was originally collected, held and processed. The Company will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Different laws may also require us to keep different data for different periods of time.
- b. When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.
- c. Unless still required in connection with the purpose(s) for which it was collected and/or is processed, our retention policy is in line with the applicable legislation of the Hellenic Republic, the recommendations of the Hellenic Data Protection Authority (HDPa) and the National Industrial Safety Regulation of the Hellenic Ministry of Defense.
- d. At present, data of candidates are retained for six (6) months from the completion of the recruitment process, whereas personal data relating to former employees are retained for a period of five (5) years after termination. Personal data relating to clients, customers, suppliers and business partners are retained during the duration of the cooperation plus 18 months.
- e. However, if before that date (i) your personal data is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it, or (iii) you validly exercise your right of erasure, we will remove or anonymize from our records at the relevant time.
- f. In some circumstances we may anonymize and/or pseudonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

- g. When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.

## **10 SECURE PROCESSING**

The Company shall ensure that all personal data collected, held, and processed is kept secure and protected against unauthorized or unlawful processing and against accidental loss, destruction, or damage. Further details of the technical and organizational measures which shall be taken are provided in Section 25 to 31 of this Policy.

## **11 ACCOUNTABILITY AND RECORD-KEEPING**

- a. The Company's Data Protection Officer (DPO) is Mr. Dimitris Chatzipanagiotidis, Quality Assurance Configuration & Information Security Manager of the Company.
- b. The Data Protection Officer (DPO) shall be working together with the HR Manager for overseeing the implementation of this Policy and for monitoring compliance with this Policy, the Company's other employment and data protection-related policies, and with the GDPR and other applicable data protection legislation.
- c. The Company shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:
- (1) The name and details of the Company, its Data Protection Officer (DPO), and any applicable third-party data processors;
  - (2) The purposes for which the Company collects, holds, and processes personal data;
  - (3) Details of the categories of personal data collected, held, and processed by the Company, and the categories of Company data subject to which that personal data relates;
  - (4) Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards;
  - (5) Details of how long personal data will be retained by the Company; and
  - (6) Detailed descriptions of all technical and organizational measures taken by the Company to ensure the security of personal data.

## **12 DATA PROTECTION IMPACT ASSESSMENTS**

- a. The Company shall carry out Data Protection Impact Assessments for any and all new projects and/or new uses of personal data [which involve the use of new technologies and the processing involved is likely to result in a high risk to the rights and freedoms of Company data subjects under the GDPR].
- b. Data Protection Impact Assessments shall be overseen by the Data Protection Officer (DPO) and shall address the following:
- (1) The type(s) of personal data that will be collected, held, and processed;
  - (2) The purpose(s) for which personal data is to be used;
  - (3) The Company's objectives;
  - (4) How personal data is to be used;
  - (5) The parties (internal and/or external) who are to be consulted;
  - (6) The necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed;
  - (7) Risks posed to Company data subjects;

- (8) Risks posed both within and to the Company; and
- (9) Proposed measures to minimize and handle identified risks.

**13 KEEPING DATA SUBJECTS INFORMED**

- a. The Company shall provide the information set out in Section 13.b. to every Company data subject:
  - (1) Where personal data is collected directly from Company data subjects, those Company data subjects will be informed of its purpose at the time of collection; and
  - (2) Where personal data is obtained from a third party, the relevant Company data subjects will be informed of its purpose:
    - (a) if the personal data is used to communicate with the Company data subject, when the first communication is made; or
    - (b) if the personal data is to be transferred to another party, before that transfer is made; or
    - (c) as soon as reasonably possible and in any event not more than one month after the personal data is obtained.
- b. The following information shall be provided:
  - (1) Details of the Company including, but not limited to, the identity of its Data Protection Officer (DPO);
  - (2) The purpose(s) for which the personal data is being collected and will be processed (as detailed in Sections 21 to 26 of this Policy) and the legal basis justifying that collection and processing;
- c. Where applicable, the legitimate interests upon which the Company is justifying its collection and processing of the personal data;
- d. Where the personal data is not obtained directly from the Company data subject, the categories of personal data collected and processed;
- e. Where the personal data is to be transferred to one or more third parties, details of those parties;
- f. Where the personal data is to be transferred to a third party that is located outside of the European Economic Area (the "EEA"), details of that transfer, including but not limited to the safeguards in place (see Section 30 of this Policy for further details);
- g. Details of data retention;
- h. Details of the Company data subject's rights under the GDPR;
- i. Details of the Company data subject's right to withdraw their consent to the Company's processing of their personal data;
- j. Details of the Company data subject's right to complain to the Hellenic Data Protection Authority (HDP) (the "supervisory authority" under the GDPR);
- k. Where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it; and

- l. Details of any automated decision-making or profiling that will take place using the personal data, including information on how decisions will be made, the significance of those decisions, and any consequences.

**14 DATA SUBJECT ACCESS**

- a. Company data subjects may make Subject Access Requests (“SARs”) at any time to find out more about the personal data which the Company holds about them, what it is doing with that personal data, and why.
- b. Employees wishing to make a SAR should do using a Subject Access Request Form, sending the form to the Company’s Data Protection Officer (DPO) at [dataprotection@isihellas.com](mailto:dataprotection@isihellas.com)
- c. Responses to SARs shall normally be made within one month of receipt, however this may be extended by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, the Company data subject shall be informed.
- d. All SARs received shall be handled by the Company’s Data Protection Officer (DPO).
- e. The Company does not charge a fee for the handling of normal SARs. The Company reserves the right to charge reasonable fees for additional copies of information that has already been supplied to an Company data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

**15 RECTIFICATION OF PERSONAL DATA**

- a. Company data subjects have the right to require the Company to rectify any of their personal data that is inaccurate or incomplete.
- b. The Company shall rectify the personal data in question, and inform the Company data subject of that rectification, within one month of the Company data subject informing the Company of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the Company data subject shall be informed.
- c. In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification that must be made to that personal data.

**16 ERASURE OF PERSONAL DATA**

- a. Company data subjects have the right to request that the Company erases the personal data it holds about them in the following circumstances:
  - (1) It is no longer necessary for the Company to hold that personal data with respect to the purpose(s) for which it was originally collected or processed;
  - (2) The Company data subject wishes to withdraw their consent to the Company holding and processing their personal data;
  - (3) The Company data subject objects to the Company holding and processing their personal data (and there is no overriding legitimate interest to allow the Company to continue doing so) (see Section 19 of this Policy for further details concerning the right to object);

- (4) The personal data has been processed unlawfully;
- (5) The personal data needs to be erased in order for the Company to comply with a particular legal obligation.

- b. Unless the Company has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the Company data subject informed of the erasure, within one (1) month of receipt of the Company data subject's request. The period can be extended by up to two (2) months in the case of complex requests. If such additional time is required, the Company data subject shall be informed.
- c. In the event that any personal data that is to be erased in response to a Company data subject's request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

**17 RESTRICTION OF PERSONAL DATA PROCESSING**

- a. Company data subjects may request that the Company ceases processing the personal data it holds about them. If a Company data subject makes such a request, the Company shall retain only the amount of personal data concerning that data subject (if any) that is necessary to ensure that the personal data in question is not processed further.
- b. In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

**18 DATA PORTABILITY**

- a. The Company processes personal data relating to employees using automated means. (payroll, pension scheme, HR software system, Building management company).
- b. Where Company data subjects have given their consent to the Company to process their personal data in such a manner, or the processing is otherwise required for the performance of a contract between the Company and the Company data subject, Company data subjects have the right, under the GDPR, to receive a copy of their personal data and to use it for other purposes (namely transmitting it to other data controllers).
- c. To facilitate the right of data portability, the Company shall make available all applicable personal data to Company data subjects in the following format: Word, PDF.
- d. Where technically feasible, if requested by a Company data subject, personal data shall be sent directly to the required data controller.
- e. All requests for copies of personal data shall be complied with within one (1) month of the Company data subject's request. The period can be extended by up to two (2) months in the case of complex or numerous requests. If such additional time is required, the Company data subject shall be informed.

**19 OBJECTIONS TO PERSONAL DATA PROCESSING**

- a. Company data subjects have the right to object to the Company processing their personal data based on legitimate interests, direct marketing (including profiling) and processing for scientific and/or historical research and statistics purposes.
- b. Where a Company data subject objects to the Company processing their personal data based on its legitimate interests, the Company shall cease such processing immediately, unless it can be demonstrated that the Company's legitimate grounds for such processing override the Company data subject's interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.
- c. Where a Company data subject objects to the Company processing their personal data for scientific and/or historical research and statistics purposes, the Company data subject must, under the GDPR, "demonstrate grounds relating to his or her particular situation". The Company is not required to comply if the research is necessary for the performance of a task carried out for reasons of public interest.

**20 AUTOMATED DECISION-MAKING**

- a. The Company does not use personal data in automated decision-making processes with respect to its employees.
- b. Where such decisions have a legal (or similarly significant effect) on Company data subjects, those Company data subjects have the right to challenge to such decisions under the GDPR, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from the Company.
- c. The right described in Section 20.b. does not apply in the following circumstances:
  - (1) The decision is necessary for the entry into, or performance of, a contract between the Company and the Company data subject;
  - (2) The decision is authorized by law; or
  - (3) The Company data subject has given their explicit consent.

**21 PERSONAL DATA**

- a. The Company holds personal data that is directly relevant to its employees, employee's relatives and candidates. That personal data shall be collected, held, and processed in accordance with Company data subjects' rights and the Company's obligations under the GDPR and with this Policy. The Company may collect, hold, and process the personal data detailed in Sections 21 to 26 of this Policy:
  - (1) Identification information relating to employees and their relatives:
    - (a) Name;
    - (b) Contact Details;
  - (2) Equal opportunities monitoring information (such information shall be anonymized where possible):
    - (a) Age;
    - (b) Gender;
    - (c) Ethnicity;
    - (d) Nationality;

- (3) Health records (Please refer to Section 22, below, for further information):
  - (a) Details of sick leave;
  - (b) Medical conditions;
  - (c) Disabilities;
- (4) Employment records:
  - (a) Interview notes;
  - (b) CVs, application forms, covering letters, and similar documents;
  - (c) Assessments, appraisals, performance reviews, and similar documents;
  - (d) Details of remuneration including salaries, pay increases, bonuses, commission, overtime, benefits, and expenses;
  - (e) Employee monitoring information (please refer to Section 25, below, for further information);
  - (f) Records of disciplinary matters including reports and warnings, both formal and informal;
  - (g) Details of grievances including documentary evidence, notes from interviews, procedures followed, and outcomes.

## **22 HEALTH RECORDS**

- a. The Company holds health records on employee and/or employee's relatives data subjects which are used to assess the health, wellbeing, and welfare of employees and to highlight any issues which may require further investigation. In particular, the Company places a high priority on maintaining health and safety in the workplace, on promoting equal opportunities, and on preventing discrimination on the grounds of disability or other medical conditions. In most cases, health data on employees falls within the GDPR's definition of special category data (see Section 2 of this Policy for a definition). Any and all data relating to employee data subjects' health, therefore, will be collected, held, and processed strictly in accordance with the conditions for processing special category personal data, as set out in Section 2 of this Policy. No special category personal data will be collected, held, or processed without the relevant employee data subject's express consent.
- b. Health records shall be accessible and used only by the Company Doctor and the HR Manager and shall not be revealed to any third party including but not limited to other employees, agents, contractors, or other parties working on behalf of the Company without the express consent of the employee data subject(s) to whom such data relates, except in exceptional circumstances where the vital interests and wellbeing of the employee data subject(s) to whom the data relates is at stake and such circumstances satisfy one or more of the conditions set out in Section 5.b. of this Policy.
- c. The Company may from time to time monitor the activities of employee data subjects. Such monitoring may include, but will not necessarily be limited to, internet and email monitoring. In the event that monitoring of any kind is to take place (unless exceptional circumstances, such as the investigation of criminal activity or a matter of equal severity, justify covert monitoring), employee data subjects will be informed of the exact nature of the monitoring in advance.
- d. Employee data subjects have the right to request that the Company does not keep health records about them or their relatives. All such requests must be made in writing and addressed to the Data Protection Officer (DPO).

**23**            **BENEFITS**

- a. In cases where employee data subjects are enrolled in benefit schemes which are provided by the Company, it may be necessary from time to time for third party organizations to collect personal data from relevant employee data subjects.
- b. Prior to the collection of such data, employee data subjects will be fully informed of the personal data that is to be collected, the reasons for its collection, and the way(s) in which it will be processed, as per the information requirements set out in Part 12 of this Policy.
- c. The Company shall not use any such personal data except insofar as is necessary in the administration of the relevant benefits schemes.
- d. The following schemes are available to employees. Please note that not all schemes may be applicable to all employees:
  - (1) payroll provider, workplace pension schemes, childcare vouchers. For further information, please contact Finance Manager.
  - (2) The following personal data may be collected, held, and processed:
    - (a) salary,
    - (b) bank details,
    - (c) national insurance number, and
    - (d) contact details.

**24**            **EMPLOYEE MONITORING**

- a. The Company may from time to time monitor the activities of employee data subjects. Such monitoring may include, but will not necessarily be limited to, internet and email monitoring. In the event that monitoring of any kind is to take place (unless exceptional circumstances, such as the investigation of criminal activity or a matter of equal severity, justify covert monitoring), employee data subjects will be informed of the exact nature of the monitoring in advance.
- b. Monitoring should not (unless exceptional circumstances justify it, as above) interfere with an employee's normal duties.
- c. Monitoring will only take place if the Company considers that it is necessary to achieve the benefit it is intended to achieve. Personal data collected during any such monitoring will only be collected, held, and processed for reasons directly related to (and necessary for) achieving the intended result and, at all times, in accordance with employee data subjects' rights and the Company's obligations under the GDPR.
- d. The Company shall ensure that there is no unnecessary intrusion upon employee data subjects' personal communications or activities, and under no circumstances will monitoring take place outside of an employee data subject's normal place of work or work hours, unless the employee data subject in question is using Company equipment or other facilities including, but not limited to, Company email, the Company intranet (if any), or a virtual private network ("VPN") service provided by the Company for employee use.

**25            DATA SECURITY - TRANSFERRING PERSONAL DATA AND COMMUNICATIONS**

- a.     The Company shall ensure that the following measures are taken with respect to all communications and other transfers involving personal data (including, but not limited to, personal data relating to employees):
- (1)     All emails containing personal data must be encrypted.
  - (2)     All emails containing personal data must be marked “confidential”;
  - (3)     Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances;
  - (4)     Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;
  - (5)     Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be deleted. All temporary files associated therewith should also be deleted.
  - (6)     Where personal data is to be sent by facsimile transmission the recipient should be informed in advance of the transmission and should be waiting by the fax machine to receive the data;
  - (7)     Where personal data is to be transferred in hardcopy form it should be passed directly to the recipient; and
  - (8)     All personal data to be transferred physically, whether in hardcopy form or on removable electronic media shall be transferred in a suitable container marked “confidential”.

**26            DATA SECURITY – STORAGE**

- a.     The Company shall ensure that the following measures are taken with respect to the storage of personal data (including, but not limited to, personal data relating to employees):
- (1)     All electronic copies of personal data should be stored securely using passwords and data encryption;
  - (2)     All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet, or similar;
  - (3)     The backup is configured to be taken on a daily, weekly and monthly basis.
  - (4)     No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets, and smartphones), whether such device belongs to the Company or otherwise without the formal written approval of Data Controller, and, in the event of such approval, strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary and
  - (5)     No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Company where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the GDPR (which may include demonstrating to the Company that all suitable technical and organizational measures have been taken).

**27            DATA SECURITY – DISPOSAL**

- a.     When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. For further information on the deletion and disposal of personal data, please refer to the Company’s Section 9, Data Retention.
- a.     The Company shall ensure that the following measures are taken with respect to the use of personal data:

- b. No personal data may be shared informally and if an employee, agent, subcontractor, or other party working on behalf of the Company requires access to any personal data that they do not already have access to, such access should be formally requested in writing and addressed to the Data Protection Officer (DPO) or the HR Manager.
- (1) No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Company or not, without the authorization of the Data Protection Officer (DPO).
  - (2) Personal data must be handled with care at all times and should not be left unattended or on view to unauthorized employees, agents, sub-contractors, or other parties at any time;
  - (3) If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it; and
  - (4) Where personal data held by the Company is used for marketing purposes, it shall be the responsibility of the Marketing Team to ensure that the appropriate consent is obtained and that no Company data subjects have opted out, whether directly or via a third-party service.

**28        DATA SECURITY - IT SECURITY**

- a. The Company shall ensure that the following measures are taken with respect to IT and information security:
- (1) All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols.
  - (2) Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of the Company, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;
  - (3) All software (including, but not limited to, applications and operating systems shall be kept up-to-date. The Company's IT staff shall be responsible for installing any and all security-related updates as soon as reasonably and practically possible unless there are valid technical reasons not to do so; and
  - (4) No software may be installed on any Company-owned computer or device without the prior approval of the Information Security Manager.

**29        ORGANIZATIONAL MEASURES**

- a. The Company shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:
- (1) All employees, agents, contractors, or other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company's responsibilities under the GDPR and under this Policy, and shall be provided with a copy of this Policy;
  - (2) Only employees, agents, sub-contractors, or other parties working on behalf of the Company that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by the Company;
  - (3) All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately trained to do so;
  - (4) All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately supervised;

- (5) All employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be required and encouraged to exercise care, caution, and discretion when discussing work-related matters that relate to personal data, whether in the workplace or otherwise;
- (6) Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed;
- (7) All personal data held by the Company shall be reviewed periodically, as set out in the Company's Data Retention Policy;
- (8) The performance of those employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed;
- (9) All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be bound to do so in accordance with the principles of the GDPR and this Policy by contract;
- (10) All agents, contractors, or other parties working on behalf of the Company handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of the Company arising out of this Policy and the GDPR; and
- (11) Where any agent, contractor or other party working on behalf of the Company handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless the Company against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

**30 TRANSFERRING PERSONAL DATA TO A COUNTRY OUTSIDE THE EEA**

- a. The Company may from time to time transfer ('transfer' includes making available remotely) personal data to countries outside of the EEA.
- b. The transfer of personal data to a country outside of the EEA shall take place only if one or more of the following applies:
  - (1) The transfer is to a country, territory, or one or more specific sectors in that country (or an international organization), that the European Commission has determined ensures an adequate level of protection for personal data;
  - (2) The transfer is to a country (or international organization) which provides appropriate safeguards in the form of a legally binding agreement between public authorities or bodies; binding corporate rules; standard data protection clauses adopted by the European Commission; compliance with an approved code of conduct approved by a supervisory authority (e.g. the Information Commissioner's Office); certification under an approved certification mechanism (as provided for in the GDPR); contractual clauses agreed and authorized by the competent supervisory authority; or provisions inserted into administrative arrangements between public authorities or bodies authorized by the competent supervisory authority;
  - (3) The transfer is made with the informed consent of the relevant Company data subject(s); The transfer is necessary for the performance of a contract between the Company data subject and the Company (or for pre-contractual steps taken at the request of the Company data subject);
  - (4) The transfer is necessary for important public interest reasons;
  - (5) The transfer is necessary for the conduct of legal claims;

- (6) The transfer is necessary to protect the vital interests of the Company data subject or other individuals where the Company data subject is physically or legally unable to give their consent; or
- (7) The transfer is made from a register that, under Hellenic or EU law, is intended to provide information to the public and which is open for access by the public in general or otherwise to those who are able to show a legitimate interest in accessing the register.

### **31 DATA BREACH NOTIFICATION**

- a. All personal data breaches must be reported immediately to the Company's Data Protection Officer (DPO).
- b. If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of Company data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection Officer (DPO) must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.
- c. In the event that a personal data breach is likely to result in a high risk to the rights and freedoms of Company data subjects, the Data Protection Officer (DPO) must ensure that all affected Company data subjects are informed of the breach directly and without undue delay.
- d. Data breach notifications shall include the following information:
  - (1) The categories and approximate number of Company data subjects concerned;
  - (2) The categories and approximate number of personal data records concerned;
  - (3) The name and contact details of the Company's Data Protection Officer (DPO);
  - (4) The likely consequences of the breach; and
  - (5) Details of the measures taken, or proposed to be taken, by the Company to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

### **32 IMPLEMENTATION**

This Policy shall be deemed effective as of 25 May 2018. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. If you believe that any of your data that the Company processes is incorrect or incomplete, please contact us using the details below and we will take reasonable steps to check its accuracy and correct it where necessary.

You can also contact us using the details below if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

Contract: N/A  
CDRL: N/A

**COMPANY PROPRIETARY**  
**COMPANY POLICIES AND PROCEDURES**  
**PRIVACY POLICY**

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**Company Contact details for queries:**

Full name of legal entity: Interoperability Systems International Hellas S.A.

Data Protection Officer (DPO): Mr. Dimitris Chatzipanagiotidis, Quality Assurance Configuration & Information Security Manager

Email address: [dataprotection@isihellas.com](mailto:dataprotection@isihellas.com)

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