

# Data Privacy and Cookies policy

*We want your Personal Information (PI) private!*

*We understand that and we strive and are committed to safeguarding your privacy.*

*We use a variety of security technologies and procedures to help provide protection across all our operations and services in accordance with the standards laid down by the General Data Protection Regulation (GDPR) when dealing with your PI<sup>1</sup>.*

## 1. Scope of this policy

- 1.1. Personal Information is information that identifies you as an individual and relates to you. It may include your name, your contact details and some invoicing information relating to you and data profile regarding your online behavior on our website
- 1.2. This privacy and cookies policy explains:
  - 1.2.1. when and why we collect PI about you (*i.e. the visitor and/or the user of our site and/or services we provide*),
  - 1.2.2. how we use it
  - 1.2.3. how we keep it secure and
  - 1.2.4. what are your rights in relation to it.
- 1.3. We may collect, use and store PI about you through our interactions with you, as described in this data privacy and cookies policy and as may be further described when we collect data from you for our services. Any of our product or services-specific privacy policies - as published by us in relation to our such product(s) or service(s) - overrides this general privacy and cookies policy as more specifically explained in our product/services-specific policies.
- 1.4. This policy is to help you understand how and why we collect PI about you and what we do with that information. It may be amended from time to time without prior notice. You are advised to check our website at [www.naz.gr/gdpr](http://www.naz.gr/gdpr) regularly for any amendments. Amendments however will not be made retrospectively.

## 2. Who are we?

- 2.1. We are NAZ TRADING S.A. of Greece
- 2.2. We can be contacted at 16, Gr. Lampraki Street, Glyfada 16674 - Email: [info@naz.gr](mailto:info@naz.gr)
- 2.3. The terms “us”, “we” “our”, “our services”, “our products” and words or phrases of similar import, mean collectively NAZ TRADING S.A., our affiliated companies, owned websites, applications, services, and products.

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<sup>1</sup> Further details on the GDPR can be found at (<http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32016R0679>). For the purposes of the GDPR, we will be the “controller” of all PI we hold about you.

This privacy policy does not apply to websites, applications or mobile platforms that are not linked to this privacy policy or to those operated by third parties. We encourage you to review the privacy policies posted on those websites, applications and mobile platforms.

### 3. What information we collect and how.

3.1. The PI we collect comes either directly from your input or automatically through internet technology.

3.1.1. **Directly from you:** When you register/create an account with us, or purchase a product or a service from us, we may securely collect a variety of information, **as this is expressly provided to us by you**, including your name, mailing address, phone number, contract preferences, email address, payment information (such as credit/debit card number), your user name and password and your comments and feedback.

**Automatically:** Our systems also collect information automatically through the use of cookies or similar internet technologies. The information that may be collected relates to your use of our services and products, such as your internet protocol (IP) address, your computer type and operating system and other technical identifiers. As a rule, cookies do not contain personally identifiable information, but when you provide your PI through our services, this information may be linked to the non-personally identifiable data stored in cookies sent to your browser from our services. For more about cookies please visit [www.aboutcookies.org](http://www.aboutcookies.org).

Once you **agree to allow our website to use cookies**, you also agree that we use the data it collects regarding your online behaviour with our site(s).

### 4. How and Why we use it.

4.1. The main reasons we securely use your PI is for:

4.1.1. assisting you in fulfilling the transactions necessary for our products and services

4.1.2. providing you support in using our products and services

4.1.3. improving (and sometimes personalizing) our products and services to you

4.1.4. contacting you regarding our products and services

4.1.5. inviting you to participate in surveys and promotion activities

4.2. Occasionally we may securely match or combine the PI that you provide us with information that is already in our records, whether collected online or offline, for the purposes described in this policy.

4.3. The data we collect by using cookies is used to customize our website to your needs. By the use of cookies and similar internet technologies we mainly remember your online selections in our services and aim to personalize your experience with us. We also use cookies to see how you use our website and services in order to enhance their performance and develop them according to the preferences of you and our visitors. We do not use these data in any other way

- 4.4. However and in addition to the reasons mentioned above, we may also process any of the PI collected where necessary for
- 4.4.1. the initiation, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and affirmation of our legal rights, your legal rights and the legal rights of others or
  - 4.4.2. in case we have to comply with a legal obligation to which we are subject, or in order to protect the vital interests of you or of another natural person.

## 5. More on Cookies and web beacons

5.1. Cookies are small text files that a website sends to the browser on your computer or mobile device when you first visit a web page so that the website can recognize your device the next time you visit.

5.1.1. Most websites typically use the following:

"**Fundamental**" cookies, which hold no personal data and do not impact your privacy but are essential in enabling key functionality such as ensuring your web browser's back button works.

"**Session**" cookies, which are temporary and deleted when you close your browser;

"**Persistent**" cookies, which remain until you delete them or they expire;

Both Session and Persistent cookies offer useful end-user features (remembering login details between sessions, items saved in your shopping basket, personalised site layouts / preferences, etc.)

"**Tracking**" cookies utilize third party tracking and analytics technologies to optimize sites, identify trends, track browsing behaviour, provide preference related marketing and provide functionality such as 'liking' an article, topic, etc.

"**Web beacons**" or "Pixel Tags", which are electronic images also known as single-pixel gifs.

Web beacons are sometimes used in HTML-formatted emails in order to tell us whether our emails are opened and verify any clicks through to links or advertisements within the email. We may use this information for (inter alia) determining which of our emails are more interesting to you.

The web beacon will be deleted when you delete the email. Emails in plain text rather than HTML do not include the web beacon.

5.2. We consider and treat information collected by cookies and like technologies as non-personal. However, to the extent that identifiers like Internet Protocol (IP) addresses or similar are considered personal information by law, we also treat these identifiers as personal information. Similarly, when non-personal information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

- 5.3. Our service providers also use cookies and these cookies may be stored on your computer when you visit our website.
- 5.4. There are a number of ways to manage cookies. If you want to disable cookies you can go to the relevant preference section of your web browser and manage your cookies preferences. The "help" portion of most browsers will tell you how to stop accepting cookies, how to be notified when you receive a new browser cookie, and how to disable existing browser cookies. However, if you block cookies, you may not be able to register, login or make full use of our services. You can also use your mobile device's settings to manage the available privacy options.
- 5.5. We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

## 6. How we share PI and to whom we may disclose it.

- 6.1. We will never sell your PI.
- 6.2. We will not share your PI with any third parties without your prior consent (which you are free to withhold) except if and where required to do so by law or as set out below.
- 6.3. In order to complete the tasks required by us and/or provide services to you and/or to serve our legitimate interests and/or to provide you with the best quality of products and services, we at times, may make certain PI available to certain persons/entities. In any such case such disclosure will be done to the minimum required and insofar as is reasonably necessary to serve the reasons and objectives of such disclosure. Such persons include:

*6.3.1. **Payment Processors & Anti-fraud systems.** We shall only transfer the necessary PI related to your identity to our certified payment processors & anti-fraud systems, in order to safely proceed to the associated payment of the service you buy from us. These systems are used both for our and your protection, since they act as safeguards for non-authorized transactions.*

## 7. How long do we keep PI?

- 7.1. We will hold your PI on our systems for as long as you receive a service from us and for as long afterwards as is necessary to comply with our legal obligations.
- 7.2. We securely delete all financial information once we have used it and no longer need it.

## 8. How we protect your PI

- 8.1. We use a variety of data security measures intended to safeguard the confidentiality, and integrity of your PI. To the extent possible, we use reasonable and appropriate technical,

administrative and physical procedures and measures in order to ensure the security of your PI. More specifically:

8.1.1. We have implemented generally accepted standards of technology and operational security in order to protect PI from loss, misuse, or unauthorised alteration or destruction.

8.1.2. For any payments which we take from you online we will use a recognised online secure payment system.

8.1.3. We will notify you promptly in the event of any breach of your PI which might expose you to serious risk.

8.2. Do note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

## 9. Children

9.1. We do not knowingly collect information from children under the age of 16 and we do not target our products and services to children.

9.2. In case children under the age of 16 require any of our services we shall, apart from the children's consent, seek to obtain also the child's legal guardian's written approval.

## 10. International Transfers

10.1. We will not transfer your PI outside the European Economic Area (EEA), unless you have provide us with your express consent and there are safeguards in place that ensure an adequate level of protection.

10.2. In case we exceptionally do so, we will do it provided that the transferred PI will be protected by appropriate safeguards, equivalent to the degree of data protection adopted or approved by the European Commission.

## 11. What are your rights in relation to PI

11.1. Under the GDPR you have the certain specified rights in relation to your PI and its protection. They can be summarised as follows<sup>2</sup>:

11.1.1. the **right to access** your PI. You are entitled to obtain confirmation as to whether or not we are processing your PI, and, if we do, you can access them together with additional information (such as, for example, the categories of PI concerned and the recipients of the PI).

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<sup>2</sup> The list that follows is indicative and for information purposes only and you are encouraged to seek professional legal advice on the full extent of your rights under any applicable laws of your country.

You may ask us to supply to you a copy of your PI we process and we shall do so within 30 days from the date we receive your request. You may submit your request at [info@naz.gr](mailto:info@naz.gr)

- 11.1.2. the **right to correct** your PI. You have the right to have any inaccurate PI about you corrected and, any incomplete personal data about you completed.
- 11.1.3. the **right to erase** your PI. You have such right in cases, for example, where processing your PI no longer serves the purposes for which they were collected/processed, or where you have withdrawn your consent to consent-based processing.
- 11.1.4. the **right to restrict** processing, where for example you have objected our processing of your PI while this objection is being verified. While processing has been restricted on such a basis, we may continue to have your PI stored but processing will be limited only according to your consent or as otherwise mentioned in clause 11.3;
- 11.1.5. the right to **object to processing** on grounds relating to your particular situation. If you make such an objection, we will cease to process the personal information, but with the exceptions referred to in clause 11.3;
- 11.1.6. the **right to have your PI transferred** to a third party, as for example in cases where you ask us to send your PI to another service provider. In such a case we will do so in a structured, commonly used and machine-readable format;
- 11.1.7. the **right to complain** to a supervisory authority, in cases where you consider that our processing of your PI infringes data protection laws; You may lodge such a complaint to the relevant supervisory authority of Greece ( <https://www.dpa.gr> ), EU or your country.
- 11.1.8. Finally, you have always the **right to withdraw your consent** to our consent-based processing of your PI.
- 11.2. For more details, please address any questions, comments, requests regarding our data processing practices and exercise of your PI related rights to [info@naz.gr](mailto:info@naz.gr)
- 11.3. We will respond to any relevant request by you in relation to your rights and/or proceed as per your exercise of your rights, always provided that:
  - 11.3.1. you provide us with sufficient evidence of your identity and that you are the person entitled to exercise such right. Such evidence may include copy of your ID card or Passport or Driving licence, telephone confirmation or other similar evidence
  - 11.3.2. Third parties' rights are not affected
  - 11.3.3. The law does not prohibit us from doing so
  - 11.3.4. We do not process your PI in order to comply with our legal obligations or to protect, exercise or establish our legal rights in litigation or out of court dispute or similar situations, or to protect your or other people's vital interests or for reasons of important public interest.