

PERSONAL DATA PROCESSING AND PROTECTION POLICY OF COMET HELLAS S.P.C.

The protection of your personal data is of utmost importance to us. This Personal Data Protection Policy hereinafter the Policy concerns the conditions of collection, storage and use of your personal data by the for courier services COMET HELLAS SINGLE MEMBER PRIVATE COMPANY, trading as COMET HELLAS S.P.C, with registered office in Athens 11 Akragantos str. 104 42, Tax ID No: 801457835, A' Athens Tax Office for Commercial Companies, website: www.comethellas.gr, tel. 210 5140823, email: info@comethellas.gr

The Company:

COMET HELLAS S.P.C is a courier company holding General Licence No 20-132 issued by the Hellenic Telecommunications and Post Commission.

1. Which are the Company's objects? According to the Articles of Association, the Company's main objects include provision of courier services for the delivery of documents, securities, parcels and small packages anywhere in Greece and abroad by any means of transport, by land, sea or air, and provision of ancillary services.

2. What are personal data? The term personal data as used in this Policy means any information relating to natural persons, either in personal or professional capacity, such as name, postal address, postcode, contact telephone number, e-mail, identity card number, tax identification number, etc., which can be used to establish the identity of a natural person, hereinafter referred to as personal data.

3. What is Personal Data Processing? Personal Data Processing means any operation or set of operations which is performed on personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission to third parties, dissemination, alignment, combination, restriction, erasure or destruction of personal data of natural persons.

4. Which of your data are being collected?

A) During the shipment and delivery of postal items:

We collect the personal data of both the sender and the recipient of the postal item, which are specified in the Express Waybill (SYDETA). In particular, the following data are being collected:

Name, Surname, Address, Postcode, Occupation, Tax ID Number, Tax Office, contact telephone number, email address, signature (including digital signature).

B) When visiting and browsing the website of COMET HELLAS:

We do not collect your data, except for the data collected by the cookies whose use you have enabled by giving your consent; specifically, the only cookies used by the website belong to the categories: (a) Strictly Necessary Cookies, and (b) Functionality Cookies, both of which are necessary for the proper functioning of the website. The information cookies collect is anonymous and they do not monitor browsing activity on other websites.

Where appropriate, and depending on the service, we may collect other personal data, mainly for the provision of special or specialised courier services, including for instance bank account number in the case of cash on delivery services.

5. For which purpose do we process your data? We collect your data solely for the purposes of: (a) the postal/courier service provided by the Company (including but not limited to data required to identify the recipient and the sender, track express shipments, etc.); (b) compliance with the obligations imposed by the applicable legislation, relating for instance to the issue of

invoices, minimum data retention periods, etc.; and (c) for statistical purposes, ensuring the appropriate level of security.

6. What are the legal grounds for the processing of your data by the Company? Data are processed for the performance of the postal/courier service contract, within the framework of the applicable legislation.

Your data, such as Tax ID Number, Tax Office and invoicing data, are collected and retained in compliance with our legal obligation imposed by the applicable tax legislation.

In case of transport outside the EU, the processing of data in the context of the postal/courier service provided requires the explicit consent/approval of the sender.

Where special categories of data are being processed, such processing takes place upon the explicit consent and specific authorization of the customer - patient.

7. Are the data being used for other purposes, such as promotion of products and/or services? No, COMET HELLAS S.P.C. does not use the data for other purposes.

8. Which are the recipients of the data? The recipients of the data include: (a) COMET HELLAS S.P.C and the absolutely necessary personnel of the Company that is bound to maintain confidentiality; (b) the enterprises cooperating with us, which process your data as data processors on our behalf and in accordance with our instructions; (c) third parties where this is imposed by contractual obligations or is necessary for the provision of the postal/courier service; (d) public or judicial authorities, or independent bodies where this is required by legal provision or by prosecutorial order or court decision/order.

The disclosure of data by transmission to third parties outside the EU is permitted only in the context of the courier service contract, requires the prior explicit consent of the sender, and is performed in cooperation with international courier companies, which are bound by their contract with us to ensure the security of your personal data.

9. How do we ensure that data processors respect your personal data?

Data processors have agreed and are bound by their contract with COMET HELLAS S.P.C.:

- ! to maintain confidentiality
- ! not to disclose data by transmission to third parties without the permission of COMET HELLAS S.P.C
- ! to take appropriate security measures
- ! To comply with the legal framework on personal data protection and, particularly, the GDPR Regulation.

10. How long do we retain your personal data? The data retention period is determined by the retention requirements imposed by the applicable legal framework governing the provision of courier services and the legal framework governing the tax obligations of COMET HELLAS S.P.C. The data retention period may be extended for the purposes of submitting evidence for the fulfillment of the Company's contractual obligations before the courts or where this is required by a rule of law or in order to comply with the recommendations of public or independent bodies.

11. Are your data secured? COMET HELLAS S.P.C. is bound to safeguard your personal data. We have taken appropriate organizational and technical measures

to ensure the safety and protection of your data from any type of accidental or unlawful processing. These security measures are reviewed and modified whenever deemed necessary. Any processing by any means is permitted only to persons authorized by us, our employees and associates, exclusively for the purposes referred to above. COMET HELLAS S.P.C. is performing regular checks and inspections to verify the security of the data and the implementation of this Policy.

12. What are your rights? You have the **right to access** your personal data. This means that you have the right to be informed by us about whether we process your data. If we do process your data, you may request to be informed about the purpose of processing, the type of data we keep about you, the third parties we disclose them to, the retention period, whether decisions on related matters are being taken by automated means, as well as about your other rights, such as the right to rectification and erasure of data, the right to restrict processing and to file a complaint before the Hellenic Data Protection Authority.

You have the **right to rectification** of inaccurate personal data. If you notice that there is a mistake in your data, you can submit a rectification request to us (e.g. name correction, change of address notice).

You have the **right to portability** of your data. You may request to receive the data you have provided to us in a readable form or you may ask us to transmit them to another data processor.

You have the **right to restriction of processing**. You may request us to restrict the processing of your data for as long as your objections to processing are being examined.

You have the **right to object** to the processing of your data. You can object to the processing of your data or withdraw your consent and we will cease to process your data, unless other imperative and legitimate reasons overriding your right exist.

13. How can you exercise your rights?

You may exercise your rights by sending us a request, describing the right, which you wish to exercise to the postal address of the Company (11 Akragantos Street, Athens 104 42) with the indication Exercise of right to access – rectification – erasure – restriction – objection or to the email address (info@comethellas.gr) with subject Exercise of right to access – rectification – erasure – restriction – objection and providing details for your request, and we will make sure to examine it and reply to you as soon as possible.

14. How can you receive information on the progress of your requests?

For more information, you may contact us by telephone at 210 5140823 or at the email address (info@comethellas.gr).

16. Do we use automated means to take decisions/engage in profiling during the processing of your data? No, we do not take decisions or engage in profiling through automated processing of your data.

17. What is the applicable law concerning the processing of your data by us? We process your data in accordance with the General Data Protection Regulation (EU) 2016/679 and the applicable national and European legislative and regulatory framework on personal data protection in general.

18. Where can you seek redress if we violate the applicable law on personal data protection? You have the right to file a complaint before the Hellenic Data Protection Authority (postal address: [1-3 Kifissias Avenue,](#)

[Athens / www.dpa.gr](#)), if you consider that the processing of your personal data violates the applicable law on personal data protection.

19. How will you be informed about any modifications to this Policy? We will update this Policy whenever necessary. If there are significant changes in the Policy or in the way that we use your personal data, we will publish related notices at a conspicuous place on our website. We encourage you to review this Policy on a regular basis in order to be informed about the methods used to protect your data.

COMET HELLAS S.P.C. is the controller of the personal data it receives from natural persons and sole proprietors.