



Privacy Statement

PRIVACY POLICY

A. Privacy Policy – Legal, Lawful and Transparent Processing

The company MEGAS YEEROS S.A. (“MEGAS YEEROS” or the “company”) and its associated companies, in particular the company MEGAS YEEROS LLC, set as their priority and are committed to respect and extensively protect the privacy, the personal data, especially the personal information (e.g. full name details) and contact information (e.g. home/work address, email, telephone number, land line or mobile, or fax) and the security of the electronic communications and transactions of the natural persons, customers, potential customers and users or guests on their websites and in case of legal entities, their representatives, agents and employees, in compliance with the relevant European and national legislation on a case-by-case basis, the decisions of the Hellenic Data Protection Authority and these terms of use or any other special terms of use that you shall be notified of. In case that any data are transferred to our subsidiary seated in the U.S.A., MEGAS YEEROS LLC, apply the binding safeguards provided in art. 46, par. 2, point b and 47 of the EU Regulation 2016/679 that will be communicated to you upon their approval by the Hellenic Data Protection Authority.

You may use the website of our company without communicating any of your personal data. When using this website, certain data are automatically stored on our servers or proxy-cache servers, as described below. To the extent that the guest wishes to receive information or services, place orders and/or file complaints and/or make declarations of will or express his interest, enter into contracts, participation in competitions and prize promotions and in general use our website in order to carry out transactions, it is highly likely that it would be necessary for more personal data to be collected and processed. If the process of personal data is required and there is no other legal basis for its legitimacy, we ask for the consent of the data subject or the data subjects, especially in case of transfer to third parties.

Please read carefully the following information on the policy of our company that will help you understand the kind and the extent as well as the conditions under and the way in which our company processes the personal data of the natural persons in the context of par. 1 and 2 of the EU Regulation 2016/679, their purposes, the legal basis and the duration of the processing or the criteria that define it, the legal interests that our company or third parties pursue, the recipients or the categories of recipients of the personal data and the security measures that our company implements for safeguarding the integrity and the confidentiality of the personal data. Hereby, we also inform you on your rights as data subjects based on art. 12 and 13 of the EU Regulation 2016/679. In general, we use the terminology and the definitions of the said Regulation that you may access by clicking [HERE](#).

If you do not agree wholly or partly with these terms you must not visit the website of our company nor provide data to us, otherwise you should exercise your rights described below. Otherwise, just the use of the website from now on that requires for the acceptance of these terms or the acceptance of this privacy policy or the provisions of your personal data to our company or any associated company thereto, means that you have consented to the processing of your personal data by our company or any other associated company thereto, especially the company MEGAS YEEROS LLC or any third party – processor.



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Our company reserves the right to review and update its privacy policy when it is deemed necessary in the future, without any further notification. For that reason, we suggest that you are informed on how our company or the associated companies thereto process your data each time that you visit its website. We inform you that our company may require for your consent every time that it amends the terms of this privacy policy and, in case that you refuse to consent, our company or any other associated company thereto may cease to communicate and/or collaborate with you and/or provide services to you.

This privacy policy applies only to the website of our company or its subsidiary MEGAS YEEROS LLC. In the event that the users of the website of our company are routed by third parties' websites that are not associated with our company by special links, hyperlinks, banners, our company is not liable for the terms and the protection of personal data that they apply.

B. Collection and Processing of personal data, purpose of the processing and consent to the concession of data

Our company collects, keeps in record and processes any personal data of the guests/users of the website, potential customers and customers that it might become aware of by introducing at the same time every necessary measure in order to ensure the confidentiality of the said information.

Our company collects the following but not limited to categories of personal data:

1. General personal data or guests/users of the website

Our company's website collects upon every visit by the data subject or an automated system several general data and information. These general data and information are stored on logfiles of the server. The following but not limited to are stored: (1) the name of the internet provider, (2) the types and versions of the browser that is used, (3) the operational system that the user uses, (4) the information on the website and the webpage through which the user accessed the website and our webpage and the information of the websites and/or the webpages that he visits from our website or our webpage, (5) the date and time of the visit to the website, (6) the IP address of the computer or the device that the user uses and in general traffic data or location data on your electronic communication, (7) other respective data and information that are used in order to prevent any network, software or hardware risks and to prevent and suppress any online attack to the information systems of our company or its associates.

Although these data could be used in collaboration with the competent authorities for the identification and the tracking of the user, they are only used for specific reasons while the user remains anonymous unless he chooses to reveal his identity or the legal grounds for processing the identity information of the user apply. At first nonetheless, the company does not seek to identify the user. The reasons for processing the said data are the following but not limited to: (1) the proper transmission of the content of our company's website, (2) the optimization of the content of our company's website as well as its advertising, (3) the assurance of the continuous access and operability of the system and our website, (4) the notification of the authorities in case of criminal acts or torts committed online. As to the remainder, the data and information collected are used on one hand for statistics and on the other hand in order to enhance the security and the protection of our company's data in favor of our users and customers. The anonymous data on the logfiles of the server are stored separately from all the personal data that the user himself provides.



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Based on its legal obligation, the website of our company includes the contact information that allow for the direct personal electronic communication with our company through the website itself or through an email. In the event that a data subject communicates with our company in this way, his personal data such as his email address and his personal information are stored automatically and they are used mainly for communication purposes or the handling of requests or complaints. These personal data are not transferred to any third party with the exception of the associates of the company that are assigned to handle these requests and complaints (e.g. the legal counsel).

2. Personal data that you provide to our company in your capacity as the customer thereof:

The following but not limited to: full name, father's name, profession, residence address, work address, commercial address, telephone number (fixed line or mobile) or facsimile, email address and in general telephone or email contact information, tax identification number (TIN) and the competent tax office, ID card information (e.g. ID card no. or passport no, date of issue, issuing authority etc.)

3. Personal data that you provide to our company in your capacity as a potential customer thereof:

The following but not limited to: full name, father's name, profession, residence address, work address, commercial address, telephone number (fixed line or mobile) or facsimile, email address and in general telephone or email contact information.

The data in points 2 and 3 are collected by you in the course of your transaction with our company especially in the course of placing an order for products or services or filing requests or inquiries thereon or participating in competitions of our company. The collection occurs mainly through the visits to our website by filling-in your data to the relevant forms or electronic applications, by registering to our customers' lists or users/guests to our website, by receiving and filling-in pre-contractual or contractual texts, letter or emails etc.

The collected data and any data resulting from them are kept by our company and on our servers or the servers of our partners and in general on memory units and information applications of ours or third parties that process your data in the E.U.

In case that you access the websites of the associated company MEGAS YEEROS LLC or any company associated to us outside the E.U. through our website, it is possible for your personal data to be transferred, collected and processed outside the E.U.

C. Purposes and legal basis for the processing of your data

The personal data that might be collected during your transaction with our company are gathered and exploited for the purposes and on the legal basis described below:

Purposes	Legal basis for the processing
- Identification of the customer and communication with him in the course of any transaction, pre-contractual or	Your legal interest as existing or potential customers

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contractual relationship with him, the fulfillment of contractual or/and legal obligations of the bank - Quality control, research, studies on your request and the handling thereof, the services provided to you	
- Receipt, monitoring and handling of your requests prior to the conclusion of the contract.	Your legal interest as existing or potential customers/ art. 6 par. 1, point b of the General Data Protection Regulation 2016/679/EU
- Conclusion, monitoring and implementation of contracts with you - Participation in competitions, prize promotions and games Gathering of complaints and dealing with problems on our products and/or services	Your legal interest as existing or potential customers/ art. 6 par. 1, point b of the General Data Protection Regulation 2016/679/EU
- Provision of information to you on our products or similar third parties products	Art. 11 Law 3471/2006
- Exercise of our rights before any court and administrative authority Regulatory compliance of our company with the general legislation, especially the legislation on foodstuff, the environmental and consumers' protection legislation as well as the legislation on quality standards for products or services. Protection of our company and its intangibles	The best interest of our company/ art. 6 par. 1, point f of the General Data Protection Regulation 2016/679/EU
- Transfer of your data to our associates in order to serve you best at the place of your residence/place of business - Transfer of your data to credit insurance companies	Your consent

Your data are processed only for the purpose they were collected and according to the applicable legal framework.

D. How does the company use your data?

Except in the case of fulfillment of legal or contractual, pre-contractual or post-contractual obligations of the company or persons associated to it towards you (main or subsequent), the company uses your personal data for your information and the provision of better services to you or your organization in compliance with your preferences or needs as well as for the promotion of the products and services of itself or its subsidiaries or associated third parties. In the course of the relevant legislation on personal data in electronic communications, your data may also be used for the promotion of our products or services or similar products or services of associated third parties even by commercial communication by letter, telephone, electronic mail or through any other mean equivalent to direct or distance electronic communication.



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The company may also use your personal data for conducting a research on personal and demographic information, the interests and the behavior of our customers, existing or potential and the guests of our website. Our goal is to better understand our customers and our guests. The research is conducted and analyzed on an aggregated and anonymous basis.

When you provide personal data to our company, the said data might be sent electronically to servers anywhere in the world (even outside the E.U.) where they might be used, stored and be processed for the purposes mentioned herein and under circumstances that ensure their security.

Whenever and wherever our company collects, processes or uses your personal data, we introduce all the appropriate measures to ensure that the said data are handled safely and according to the implemented privacy policy.

Our company does not use your data for automated decision-making.

E. Data retention

The time period that the company processes, uses or retains your personal data is the minimum required for the achievement of the purpose of the processing or the time period provided by the European/Greek legislation and in general by the regulatory framework and the codes of conduct that our company is subject to. The data mentioned in B.1. as data of simple guests/users of the company's website are not retained under normal circumstances for a time period that exceeds 14 days. Upon the expire of the required or provided time period for the retention of your data, they are erased or anonymized automatically.

F. To whom may the company disclose your personal data?

Our company may disclose your personal data to third parties for the purposes described above or in order to enter into the contract with you or fulfill any pre-contractual, contractual (main or subsequent) or post-contractual obligations towards you and the persons associated with you, address any request of yours on its products and services or in order to process a payment. Moreover, the company may transfer the personal data that it collects to third parties to whom it assigns the processing of the said data on its behalf such as freelancers, advisors, auditors, commercial partners, associated companies for the provision of services on the commercial promotion, telecommunications, companies for market research services and customer services as well as internet service providers or information technology services provides. In this case, the company is still liable for the processing of your personal data and determines the specifications of the processing, signs a special contract with the third parties to whom it assigns processing activities in order to ensure that the processing is carried out according to the applicable legislation and every natural person may freely and without any restrictions exercise its rights provided in the said legislation. In any other case, the company does not disclose any personal data of the user, unless the user consents thereto or we are legally committed to do so. The company ensures the control and the liability for the use of your personal data provided to the former.

Some of the aforementioned third parties might be outside the European Economic Area but they always fulfill the security and protection of your data requirements as set out by the legislation and the privacy policy that we implement.



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Furthermore, the company might also use and disclose your personal data every time we are obliged to do so based on the applicable legislation or when it is necessary for the protection and safeguard of our legal interests or just in the course of carrying out our activities in case of outsourcing or when data are processed by our partners by ensuring always that the security and protection of your data are safeguarded as set out by the legislation and the privacy policy that we implement.

G. Direct Marketing

You may at any time prohibit the use of your personal data for direct marketing. If you wish so, you may contact us for further information.

H. Links

The website of our company has links to websites of companies – members of the distribution network, resellers and in general partner companies of MEGAS YEEROS or third parties. This privacy policy applies only to the personal data collected on the websites of MEGAS YEEROS that you may access on: <http://www.megayeeros.gr> and <http://www.megasyeeros.com>

We are not liable for the privacy policy that websites other than the aforementioned just above implement. If you decide, at your responsibility, to use any of these links, we recommend that you read carefully and check upon leaving our website, the information on the privacy policy of the websites of third parties.

I. Security

MEGA YEEROS introduces technical and organizational safeguards and security measures in order to protect your data from any accidental or intended loss, destruction, alteration, illegal access or use by unauthorized persons. Everyone that processes personal data and any third party to whom the company has assigned the processing of your personal data must respect the confidentiality thereof. The company protects your personal data during their transfer using encryption methods. It uses computer systems with limited access protocols that are placed in facilities with physical, electronic and procedural security measures in order to ensure the protection of confidentiality and the safety of the information that are disclosed to the company. It has implemented high security standards in order to prevent any unauthorized access. Every prevention, control and information measure is in compliance with the General Data Protection Regulation (EU) 2016/679 and the Directive (EU) 2016/680.

More specifically as to data that are transferred to third parties on grounds that the users have given their consent for, our company has ensured the implementation of the security measures both technically and organizationally. During any electronic communication of our company, we use the provided secure communication protocols and the best practices.

In any case, the company does not undertake any responsibility for any interception, amendment or illegal loss of data during their transfer to it given that there is no technical measure that can fully ensure the security of your data especially of those transferred electronically. At your discretion, we may seek for alternative ways of processing your data, e.g. by telephone.

J. Truthfulness of the data



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The data subject warrants that the provided personal data are accurate, complete, true and updated and he undertakes to notify the company on any change thereon. The company reserves its rights to exclude any user who provided false data.

K. Your rights on your personal data

Every natural person whose personal data are being processed by our company has the following rights laid down by law:

1. Access to your data – Right to be informed

You have the right to receive confirmation from our company on whether or not your personal data are being processed and verify the legitimacy of the processing. Therefore, you have the right to access your data and receive additional information on the processing thereof according to art. 15 of the EU Regulation 2016/679, as to the following:

- a) the purposes of the processing
- b) the categories of personal data concerned
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations
- d) where possible, the envisaged period for which the personal data will be stored or, if not possible, the criteria used to determine that period
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing
- f) the right to lodge a complaint with the Hellenic Data Protection Authority
- g) where the personal data are not collected from the data subject, any available information as to their source,
- h) the existence of automated decision-making, including profiling, referred to in article 22(1) and 4 of the EU Regulation 2016/679 and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject

2. Rectification of data

According to art. 16 of the EU Regulation 2016/679, you have the right to rectify, update or modify your personal data by filing a request or an amending statement to the Information Security Officer of our company as set out below.

3. Erasure of data

According to art. 17 of the EU Regulation 2016/679, you have the right to file an erasure claim for the personal data, when one of the following applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed,
- b) the data subject had withdrawn the consent on which the processing is based according to point (a) of article 6 or point (a) of article 9(2) of the EU Regulation 2016/679 and where there is no other legal ground for the processing
- c) the data subject objects to the processing pursuant to article 21(1) and there are no overriding legitimate grounds for the processing or the data subject objects to the processing pursuant to article 21(2) of the EU Regulation 2016/679
- d) the personal data have been unlawfully processed



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- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the data controller subject
- f) the personal data have been collected in relation to the offer of information society services referred to in article 8(1) of the EU Regulation 2016/679

When we do not process your data upon your consent or in order to safeguard our legal interests. In any case (such as when there is a contract, an obligation to process personal data imposed by law, public interest), the said right is subject to certain limitations or does not apply as the case may be.

4. Restriction of processing

According to art. 18 of the EU Regulation 2016/679, you have the right to ask for the restriction of processing of your personal data when one of the following applies: (a) you contest the accuracy of the personal data and until they are verified, (b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead, (c) we no longer need the personal data for the purposes of the processing but you require them for the establishment, exercise or defense of legal rights, (d) you have objected to the processing pursuant to art. 21(1) pending the verification whether the legitimate grounds of the controller override yours. Objection to the processing:

5. Right to object

According to art. 21 of the EU Regulation 2016/679, you have the right at any time to object to the processing of your personal data in the event that as set out above, it is necessary in order to serve the legal interests that we pursue as data controllers as well as the processing for direct marketing and profiling.

6. Data portability

According to art. 20 of the EU Regulation 2016/679, you have the right to obtain your personal data free of charge in any form that will allow you to access them, use them and process them by any widely available processing method. Moreover, you have the right to ask us if it is technically feasible, to transmit your data directly to another data controller. This right of yours applies to your data that you have provided to us and they are processed by automated means based on your consent or the implementation of the relevant contract.

In order to exercise any of the aforementioned rights, you may contact the Information Security Officer of our company as set out below.

7. Right to withdraw consent

According to art. 7 par. 3 of the EU Regulation 2016/679, you have the right to withdraw your consent at any time. We reserve our right to inform you on any effects that such a withdrawal might have on the provision of our services to you and your convenience in general.

8. Right to lodge a complaint

You have the right to lodge a complaint with the Hellenic Data Protection Authority (www.dpa.gr):
Call center: + 30 210 6475600, Fax: +30 210 6475628, Email: contact@dpa.gr

L. Use of cookies and similar technologies



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Our company may collect identification data on the guests/users of the website using the respective technologies such as “cookies” or/and internet IP monitoring. “Cookies” as small text files sent and stored on your computer or any other device or terminal equipment that you use to access the Internet every time to visit a website without accessing any documents nor files on your device. Many websites and servers use respective technologies, such as “cookies” or/and internet IP monitoring.

Most “cookies” contain the so-called “Cookie-ID”. “Cookie-ID” is a unique cookie identifier. It is a string of characters that websites and servers associate with the browser on which cookies are stored. This allows for websites and servers that you visit to distinguish your browser from others that contain other “cookies”. A specific browser may be detected and identified through a specific “cookie-ID”.

Its website uses cookies for different reasons and especially in order to facilitate the access of the user to its services available online as well as for statistics (e.g. number of visitors, recording of the guests’ interest on the products and the services of our company). The data collected through cookies are not used in order to locate the user.

Moreover, in the course of advertisements uploaded on the website, third parties that are advertised or advertising servers, including Google search engine, may place or identify unique cookies on the browser used by the guest.

The guest on the website may set his web browser to either alert him on the use of cookies or not to allow the use of cookies under any circumstances. To that end he might review the instructions on his web browser or on help to find more about the said operations.

It is noted that the non-acceptance of the use of cookies may affect the provision of certain services and information by the company.

M. Contact information

Please contact the Information Security Officer of Megas Yeeros on any trouble you might deal with or any inquiries or your suggestions.

Information Security Officer of Megas Yeeros Group S.A.

Pantelopoulos Evangelos

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Fax: +30 210-5584099

Email: [epantelopoulos\(@\)megasyeeros.gr](mailto:epantelopoulos(@)megasyeeros.gr)

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The constant internet development requires for the privacy policy to be updated from time to time. We reserve the right to make modifications whenever it is deemed necessary.

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