# **Data Protection Policy**

www.aggelakakis.gr Ioannikeios P.C.



#### **Data Protection Policy**

We would like to inform you that, with respect to your personal data, "Aggelakakis & Associates", the owner company of the website <a href="www.aggelakakis.gr">www.aggelakakis.gr</a> maintains your personal information, strictly confidential and inaccessible to any person who is not directly involved in the process of the maintenance of your information.

"Aggelakakis & Associates" will not transfer your information to any third party for any reason other than the relevant provisions of the law and to the appropriate authorities only. The management and protection of the personal data of the visitor / user of the services of www.aggelakakis.gr is subject to the terms of this section as well as to the relevant provisions of Greek and European law.

#### 1. «Aggelakakis & Associates" identity

If you have questions regarding our company Privacy Policy, you can contact us using the information below.

"Athanasios Aggelakakis & Co LP" - "Aggelakakis & Associates"

Dodekanisou 27, 54625

Thessaloniki

Telephone No.: +302310500405

E-mail: info@aggelakakis.gr

You can submit any questions you may have about personal data protection, privacy and data security at <a href="mailto:info@aggelakakis.gr">info@aggelakakis.gr</a>.

#### 2. What information do we collect?

You can browse our site anonymously.

If you choose to subscribe to our newsletter, you will only be asked to enter your email address (E-mail).

If you choose to let us know that you want us to communicate with you, you will be asked for the following information:

- 1. Name,
- 2. E-mail,
- 3. Address,
- 4. The type of service that you want us to provide,
- 5. The town of your residence (so that we can assign your request to the appropriate agent),
- 6. Additional comments about your request.

# 3. How do we use your data?

Any of the information we collect from you may be used for one or more of the following purposes:



- 3.1. To customize your experience (information will help "Aggelakakis & Associates" better meet your individual needs).
- 3.2. To improve our website.
- 3.3. To recognize you as a party.
- 3.4. To contact you.
- 3.5. To send periodic emails (The email address you provide can be used to send information and updates).
- 3.6. In order to provide you with proper, safe and complete services through our online store.

You can unsubscribe at any time via email.

#### 4. Legal basis

4.1. General Data Protection Regulation 2016/679 EU (GDPR)

The processing of your data is based on your consent, therefore, you can withdraw your consent at any time, either through the feature given to you in the newsletters, or by sending an e-mail to <a href="mailto:info@aggelakakis.gr">info@aggelakakis.gr</a>.

#### 5. How do we protect your information data?

"Aggelakakis & Associates" implements the following technical and organizational measures to protect the security of your personal data from accidental or unlawful destruction or accidental loss, alteration, unauthorized use, unauthorized modification, disclosure or access to all other forms of unlawful processing.

#### 5.1. Availability

No permanent personal data is stored on the "Aggelakakis & Associates" premises. Therefore, physical security is maintained by "Aggelakakis & Associates" contracted subcontractors.

# 5.2. Integrity

The integrity of your data is guaranteed by the provisions of "Aggelakakis & Associates"'s contractual relationship with its subcontractors.

#### 5.3. Confidentiality

The confidentiality of your data is guaranteed by the provisions of "Aggelakakis & Associates"'s contractual relationship with its subcontractors.

#### 5.4. Transparency

"Aggelakakis & Associates" will keep you informed at all times of changes to privacy and data security procedures, including practices and policies. You can request information at any time about where and how the data is stored, secured and used. "Aggelakakis & Associates" will also provide summaries of the Agency's independent audits.

#### 5.5. Isolation

Access to personal data is blocked by default. Access to personal data is restricted to unauthorized personnel.



#### 5.6. The possibility of intervention

"Aggelakakis & Associates" grants access, correction, deletion, blocking, and objection rights, allowing you to send instructions through the "Aggelakakis & Associates" helpdesk and giving the customer the opportunity to object when "Aggelakakis & Associates" intends to make changes to the relevant practices and policies.

#### 5.7. Monitoring

The performance and availability of the system are monitored by both internal and external monitoring services.

#### 5.8. Notification of breach of personal data

In the event of your data being compromised, "Aggelakakis & Associates" will notify you within 72 hours by email with information on the extent of the breach, the data affected, the impact on the service and "Aggelakakis & Associates" saction plan for taking measures to secure the data and to limit any adverse effects on the data subjects.

"Personal data breach" means the breach of security that results in accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access to personal data transmitted, stored or otherwise processed in connection with the provision of the Service.

#### 6. Cookie policy

## What cookies are and why do we use them?

They are small pieces of information stored on computers for the purpose of identifying the browser used when browsing websites. Device IDs are aggregated from available system components, which may include IP addresses, user agent information (browser version, operating system type and version) or device-generated identifiers, such as Apple Advertiser IDs, Apple IDs for vendors, Google Android IDs, or Google Play Store ad IDs. The cookies and similar technologies can be used for memorizing data such as identifiers and user preferences.

The use of cookies makes it easy for our Website to memorize information about your visit, collecting useful information about your search preferences. So the search experience will be enhanced the next time you visit us. In addition, cookies help us see the performance and traffic of our Website, improving its presentation and content to

#### What cookies do we use?

our visitors' preferences.

Some or all of the cookies described below may be stored in your browser. You can view and manage cookies in your browser (however mobile browsers may not offer this visibility). Our I site may use the following cookies:



А	Absolutely Necessary Cookies	Are used to make our site work effectively and make it easy for you to visit and use its features. They are used, for example, to monitor the data that you enter when filling out web forms on different pages and help us to ensure that the content of your page loads quickly and efficiently distributing the workload between computer crowds (balance of cargo load balancing).	These cookies are update cookies that are deleted when you close your browser.
В	Analysis / performance Cookies	Are used to analyze how our website works to the improve and maximize its features. They are used, for example, to measure the number of visitors they visit, to estimate the number of unique visitors, to identify the most recognizable search engine keywords that lead to a website, or to navigate. We use these cookies only if you have given us your prior consent.	These are generally "persistent" because they remain on your device so we can use them during another visit to our site.
С	Functionality Cookies	Help improve your experience by doing things like remembering preferences, choices you make while visiting the site, or past actions. For example, these cookies may remember preferences such as text size, backgrounds and other customizable elements of the site. We use these cookies only after you have given us your prior consent.	These are generally "persistent" because they remain on your device so we can use them during another visit to our site.
D	Targeting Cookies / Advertising	Used to share information with third parties with which we advertise so we know how you have approached our site. These cookies record your visit to our site, the parts of our site you are interested in, and the links you followed to identify yourself as a previous visitor and to detect your activity on our site, and on other sites you visit. This information is used to show you ads that we believe may be of interest to you, customize how we communicate with you, or customize the content of the communication we send you. We use these cookies only after you have given us your prior consent.	These are generally "persistent" because they remain on your device so we can use them during another visit to our site.



# More Specifically:

Source	Name	Purpose	Duration
Site	PII_language This cookie is used to store the user's preferences regarding the language.		Permanent
Site	_ga This cookie is used to distinguish unique users by assigning a randon		Main purpose
		generated number as a customer ID. It is included in every page	of the cookie:
	request on a website and is used to calculate visitor, session and campaign data for website analytics reports.		Performance
Site	_gat	This cookie is associated with Google Universal Analytics and	Main purpose
		according to the documentation, is used to moderate requests –	of the cookie:
		limiting data collection to high-traffic sites.	Performance
Site	_gid This cookie is used to identify users who accept or reject cookie		Main purpose
		notification/banner.	of the cookie:
			Performance
Site	1P_JAR	These cookies are used by Google to store user preferences and	Session
		information when viewing pages with Google maps on them.	
Site	OGPC These cookies are used by Google to store user preferences and		Session
		information when viewing pages with Google maps on them.	
Site	CONSENT	These cookies are used by Google to store user preferences and	Session
		information when viewing pages with Google maps on them.	
Site	NID Google uses cookies such as NID and SID to individualise		1 year
		advertisement in Google products such as Google Search. We use	
		these cookies to collect information on, for example, your most recent	
		searches, your previous interactions with advertising material	
		provided by an advertiser or your search results, as well as your visits	
		to the websites of advertisers. This means we can provide you with	
		individualised adverts on Google.	
		https://policies.google.com/technologies/types?hl=de	
Site	_ga	_ga This cookie is used to identify unique users and expires after two	
		years.	



#### Don't want cookies?

You can enable, disable, or even completely clear cookies through the setting options in your browser.

For example, in Chrome, you can click on the Chrome menu and then select Settings / Privacy / Content Settings and change the cookie settings to your preferences.

If you choose to disable cookies, some parts of the site may not function properly.

More information on the types of cookies is available at <a href="http://www.allaboutcookies.org">http://www.allaboutcookies.org</a>. If you would like to know how to control or remove cookies, please visit <a href="http://www.aboutcookies.org">www.aboutcookies.org</a>.

#### 7. Do we transfer or report data to third parties?

«Aggelakakis & Associates" does not sell, market or otherwise transfer personally identifiable information to third parties.

These do not include trusted third parties or subcontractors who assist us in the operation of our website and our business or in your service. These trusted parties may have access to personally identifiable information based on their need to know and are required to sign a Privacy Statement and keep your information confidential for the duration required.

We may also make your data available when we believe the action is lawful, or protects our rights or the property or safety of others or others. In addition, non-personally identifiable information may be provided to third parties for advertising, marketing or other purposes.

#### 7.1. Subcontractors / trusted third parties

Subcontractors sign a Declaration of Confidentiality.

## 7.2 Legally required disclosure

«Aggelakakis & Associates" does not disclose customer data to the law enforcement agency unless instructed to do so by you or where required by law. When governments make a legitimate request for customer data from «Aggelakakis & Associates", «Aggelakakis & Associates" limits disclosure. «Aggelakakis & Associates" will issue specific data only on the basis of the relevant legal requirement.

If it is required to disclose your information, «Aggelakakis & Associates" will notify you immediately and provide you with a copy of the claim, unless prohibited by law.

#### 8. Third party links

Sometimes, in our sole discretion, we may include or offer third party products or services on our site. These third party sites have separate privacy policies. Therefore, we have no responsibility or liability for the content and activities of these linked sites. Nevertheless, we seek to protect the integrity of our website and to welcome any comments about these websites.



#### 9. Where do we store your personal data?

Your personal data will not be transferred, stored and / or retrieved by "Aggelakakis & Associates" outside the European Union.

#### 9.1. Location of personal data

All data is stored in databases and files on "Aggelakakis & Associates" s proprietary server. The servers are located in "Aggelakakis & Associates".

For databases we get back up at regular intervals, so that it can be restored within a reasonable time. The backups are stored in the same geographical location as the database.

#### 9.2. Installing software on the client system

No software installation is required to use the service.

#### 10. Access, data portability, migration and aid transfer

You can receive confirmation from "Aggelakakis & Associates" at any time as to whether your personal data will be processed.

You can request a full copy of the data at any time, which you can transfer to another data controller. Your data will be delivered by "Aggelakakis & Associates" within 30 business days as spreadsheet files in Microsoft Excel format. Logical relationships between data sets will be maintained in the form of unique identifiers.

#### 11. Request for correction, restriction or deletion of personal data

#### 11.1. Correction

You may at any time request, without undue delay, the correction of inaccurate personal data concerning you.

# 11.2. Restriction of the processing of personal data

You can at any time ask «Aggelakakis & Associates" to restrict the processing of personal data when one of the following applies:

- a. if you dispute the accuracy of the personal data and for a period of time until «Aggelakakis & Associates" verifies the accuracy of the personal data,
- b. if the processing is illegal and objects to the deletion of personal data and you require that its use be restricted, or
- c. if «Aggelakakis & Associates" no longer needs personal data for processing purposes, but is required of you to establish, exercise or defend legal claims.

#### 11.3. Deletion

You can request the deletion of your personal data without undue delay, and «Aggelakakis & Associates" must delete your personal data without undue delay when one of the following applies:



- a. if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed,
- b. if you withdraw your consent, on which the processing is based and where there is no other legal basis for processing,
- c. if you object to the processing in case the processing is intended for direct marketing,
- d. if the personal data has been illegally processed, or
- e. whether personal data must be deleted for compliance with a legal obligation under Community or national law.

#### 12. Data retention

#### 12.1. Data retention policy

The data you have provided to "Aggelakakis & Associates" with your consent will be retained until the consent is revoked.

12.2. Data retention for compliance with legal requirements

You may not ask "Aggelakakis & Associates" to change any of the predetermined retention periods other than the grounds for deletion under paragraph 11.3, but you may suggest changes to comply with specific laws and regulations.

12.3. Data recovery and / or data deletion

Upon request for deletion, there will be no data other than the Account Data, after the end of the contract.

#### 13. Liability

«Aggelakakis & Associates" uses a wide range of built-in recording functions on its online platform. «Aggelakakis & Associates" records all system updates, configuration and access changes so that it is fully aware of any unauthorized or accidental changes.

#### 14. Cooperation

«Aggelakakis & Associates" will work with you to ensure compliance with applicable data protection provisions, e.g. so that you can effectively ensure the exercise of the rights of the data subjects (right of access, correction, deletion, exclusion, opposition) for incident management, including forensic analysis in the event of a breach of security.

#### 15. Your consent

By using our site, you agree to this Privacy Policy.

#### 16. Changes in our privacy policy



If we decide to change our Privacy Policy, we will post these changes on this page and / or update the Privacy Policy date below.

This Privacy Policy was last modified on November 30, 2022.

# 17. Complaint

You can file a complaint at any time regarding the collection and processing of personal data by «Aggelakakis & Associates". In Greece, you can file a complaint to the Personal Data Protection Authority <a href="http://www.dpa.gr">http://www.dpa.gr</a>.