PERSONAL DATA PROCESSING POLICY

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PERSONAL DATA PROCESSING POLICY

1. Purpose and objective of Policy

This policy describes how EUROCERT processes your personal data.

The objective of this Policy is to describe:

- the purpose we process personal data and the legal basis,
- the categories of personal data we collect,
- the categories of data subjects,
- the period for which the personal data will be stored,
- the categories of recipients of personal data,
- the rights of data subjects,
- if we intend to transfer personal data to a third country or to an international organisation,
- the existence of automated decision-making, including profiling.

2. Policy and responsibilities

We pledge to keep this policy for the processing of personal data under regular review to ensure that it is updated and accurate. Changes in this policy will apply to data collected from the date of the revised version and to the existing data we keep.

Responsible for the review of this policy is the Personal Data Officer. Responsible for the approval of the Policy is the Top management.

3. Contact Details of controller

The EUROCERT is the controller of the personal data. There are a number of different ways you can contact us, you can call, mail, send fax or/and send a letter to postal address.

Contact Details	
Postal address	Chloe 89 & Lykovryseos
Phone	0030 2106 252495
Fax	0030 2106 203018
E-mail	info@eurocert.gr

4. Contact Details of DPO

To exercise your rights or for any other reason relating to the processing of personal data carried out by EUROCERT you can contact EUROCERT 's Data Protection Officer at **privacy@eurocert.gr** or through the postal address of EUROCERT.

5. Collection of Personal Data

Most of the personal data we process provided to us directly from the data subject for one of the following reasons:

- They have applied for employment with us.
- They have subscribed to our newsletter.
- They have submitted a request through the applications form of each service.
- They represent their organization.
- They work in controlled / inspected organizations by EUROCERT.
- They have participated in our event and have expressed desire to participate.
- They are requesting.

Also, personal data we receive indirectly, in the following cases:

- We communicate with an organization and gives us the personal details of individuals representing them.
- The personal data obtained during the audit / inspection in the inspected organizations such as employee data, suppliers, customers or the inspected organization and data in legal documents of the organization.

6. Principles relating to processing of the personal data

For each processing of personal data carried out by the EUROCERT, the processing is governed by the following principles:

- Principle of lawfulness, fairness and transparency

The data are processed lawfully, fairly and in a transparent manner with respect to the data subject.

- Principle of purpose limitation

The data collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

- Principle of data minimization

The data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

- Principle of accuracy

The data are accurate and, where necessary, updated.

- Principle of storage limitation

The data kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

- Principle of integrity and confidentiality

The data are processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

EUROCERT is responsible and is able to demonstrate compliance with the above principles, Principle of accountability.

7. Design Services

EUROCERT taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing, implements the appropriate technical and organisational measures , both at the time of the determination of the means for processing and at the time of the processing itself, which are designed to implement data-protection principles, such as data minimisation, in an effective manner and to integrate the necessary safeguards into the processing in order to meet the requirements of the GDPR and protect the rights of data subjects.

This requirement applies to the range of data collected, the degree of processing, the storage period and accessibility. In particular, these measures ensure that, by definition, personal data are not made accessible to an indefinite number of individuals.

8. Rights of data subject

According to the data protection legislation, you have rights which you can exercise as a data subject. These rights are:

- The right of access

You have the right to ask us at any time, a copy of your personal data. There are some exceptions, which means that you may not always get all the information we keep.

- The right to rectification

You have the right to request at any time from us to correct information that you believe is inaccurate. You also have the right to ask to supplement the information that you consider insufficient.

- The right to erasure

You have the right to ask us to delete your personal data in some cases.

- Your right to restriction processing

You have the right to ask us to restrict the processing of your information in certain cases.

- Your right to object to the processing

You have the right to object to the processing of your personal data.

- Your right to data portability

This only applies to the data have been provided to the EUROCERT. You have the right to ask us to transmit the data you provided to another organization or to give them to you. The right applies only if you process data based on your consent, or conclusion of a contract and the processing is automated.

- The right to complaint

You have the right to complain to the supervisory authority, the Authority for the Protection of Personal Data.

Contact Details of Hellenic Data Protection Authority:

- Postal Address: Kifisias 1-3, str 115 23, Athens
- Call Centre: 0030 210 6475600
- Fax: 0030 210 6475628

Clarifications about your rights:

- You may exercise these rights for free, and within one month of receipt of your request we will respond accordingly. However, if your request is complex or there are a large number of requests you will let you know within a month if we need to take other extension (2) two months within which to reply.
- If your request is manifestly unfounded or overly particular because of their repetitive nature, the Company may require the payment of a reasonable fee, taking into account administrative costs for the provision of information or perform the requested action or refuse to follow the request.
- To protect the confidentiality of your information, we will ask you to verify your identity before proceeding to satisfy any request by submitting your rights. If you have authorized a third party to submit a request on your behalf, we will ask him to prove that he has your permission to act for this purpose.
- All requests are recorded in an internal document held by the EUROCERT, «Register of Subject's Request" for the purpose of management and maintenance of the Subject's request.

9. Transmission of Personal Data

Access to personal data processed by EUROCERT may also have natural or legal persons as external auditors of the requested service, technical experts, consultants of all kinds (economic, legal, etc.), development service providers and maintenance of networks and applications, with which we maintain contract in order to complete certain tasks on our behalf and in each case subject to confidentiality.

In such a case, the data will be kept safely and access will be maintained only for the period indicated. This means that they can not engage in further processing of personal data, unless we give them an explicit mandate to do so, nor to transmit personal data to other third parties without the written approval of EUROCERT.

We will not share personal data with third parties without your consent, for direct marketing purposes or services.

The EUROCERT may transmit the data to third parties when required by the contractual, statutory and regulatory requirements shall observe. Such third parties may be accreditation bodies, government authorities and agencies, chambers etc.

If required transfer of personal data to countries outside the European Economic Area (EEA), it shall be based on:

- EU competence decisions, or
- binding corporate rules, or
- standard contracts or codes of conduct approved.

10. Security of Personal Data

The protection of personal data is vital to our success. The principle of information security means:

- protection of personal data processed by appropriate technical and organizational measures at the operational, functional and strategic level to ensure the integrity, confidentiality and availability of data and their protection against risks such as unauthorized access, destruction, use and / or modification throughout their life cycle,
- selection of processors providing sufficient guarantees regarding the organizational and technical measures for the processing of data and ensuring compliance with these measures,
- selection of measures in accordance with applicable legal, regulatory and contractual requirements that are committed to observe, international standards and the results of systematic assessments of security risks to the rights and freedoms of individuals,
- implementing controls in proportional to the likelihood and severity of potential consequences, the type and amount of personal data, the category and the number of subjects who may be affected and the context within which the processing takes place,
- limiting access only to those individuals who require access to perform their duties and limiting the access of those individuals only to those data they need to perform their duties,
- resolving risks and vulnerabilities that are discovered through privacy risk assessments and audit processes, and
- subjecting of technical and organizational measures to periodic review and reassessment.

11. Use of the sitewww.eurocert.gr

The EUROCERT collects personal data of visitors / users of the website only when they themselves voluntarily provide them. Personal data are data that can be used to determine identity or contact with a person as well as other data concerning that person.

The personal data collected during the use of the section "Contact" and filling in the form are the following:

- Full name.
- Mobile and landline telephone number.
- Email.

Our policy dictates, to use this information for internal use only and not to disclose it to third parties for commercial purposes. But if you ask for information about the services of EUROCERT, we can provide this information, in addition to our employees, to external partners to enable them to contact you for marketing purposes of our products and services.

The EUROCERT may obtain an identification of the website users using similar technologies, such as cookies and / or tracking Internet Protocol address (IP). The cookies are small text files stored on the hard disk of the visitor / user and no knowledge of any document or file from his computer. Used to facilitate the visitor / user regarding the use of specific services and / or pages of the website, for statistical purposes and in order to define areas which are useful or popular. These data may also include the type of browser (browser) used by the visitor / user, the type of computer, operating system, internet service providers and other such information.

The visitor / user of the site can set the program for surfing the Internet (web browser) so as to warn about the use of cookies in specific services or to refuse to accept the use of cookies at any time. If the visitor / user of particular services and pages does not wish to use cookies, you can not have further access to these services.

The site contains links (links) to other websites that are under the responsibility of third parties (natural or legal). EUROCERT offers these links purely for assistance. Access to other Sites is your responsibility and EUROCERT is not liable and does not approve of or accept any liability with regards to the contents or use of those Sites.

The management and protection of personal data of the visitor / user of the website is subject to the terms of this Policy as well as in accordance with national, Community and international law on the protection of individuals against the processing of personal data, as applicable.

Any possible future changes will be subject to this Policy. In any case, EUROCERT reserves the right to change the privacy conditions in accordance with the applicable legal framework.

Therefore, these data protection terms can be reviewed and updated at any time without notice. Users of the site are asked to check periodically these terms for any changes, and continued use of means that they accept all the possible modifications thereof.

12. Call center

Calling to the EUROCERT's call centre, we collect your telephone number, the date, call duration and time but the call itself is not recorded. We use this information to call you again, if you asked us to do, if your line is dropped or if there is a problem with the line.

We also use the information that is recorded to check the calls that we receive when our offices were off.

We do not record audio calls but may keep notes. We retain this information as required to fulfill the request.

13. Application for work

We aim to process this information to evaluate your suitability for the position for which you apply.

The legal basis on which we base the processing of your personal data is Article 6, paragraph 1 (b) of

GDPR, which concerns the processing required for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

We will use the contact information you provide us to contact you. We use other information you provide us to evaluate your suitability for the position.

We ask your personal information such as your name and contact information. We will also ask you previous experience, education, letters of recommendation and possibly details of what you allocate and answers to questions regarding the position. Access to all this information will be the recruitment team.

We may ask you to participate in an interview. The information provided by you and will be recorded, for example, can keep notes of the interview. This information is in our possession. The final hiring decisions are made by managers.

If rejected for the position, you may ask you if you want to keep them. If you say yes, we will contact you if other suitable vacancies are created, otherwise your data erased. When engaging retain your personal data for as long as required by law, depending on the purpose and type of processing.

As an individual, you have certain rights regarding your personal data. For more information about your rights, see section 8 of this Policy.

If you accept a final offer from us and hired some of your personal files will be kept in an internally used personal file system. Details for you will be provided to the company that provides payroll services us. This will include your name, your bank details, address, date of birth, national insurance number and salary.

Similarly, health and pension reservations, and your data will be provided to pension funds which are registered / -n. In turn, the funds provide the data to the Ministry of Labor. The data provided will be your name, your birth date, the number of National Insurance and your salary. Your bank details will not be passed.

14. Taking part in a Seminar

The purpose of collecting such data is the effective organization of the seminar.

The legal basis on which we base the processing of your personal data is Article 6, paragraph 1 (b) of GDPR, which concerns the processing required for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

Taking part in our seminar, we will ask you:

- your contact information, name, title, telephone number, email address, including the name of the organization that may represent, and
- tax information such as VAT and Tax.

These data are necessary:

- to let you know if there is change of date or cancellation of the seminar,
- for issuing the relevant certificate and
- for the issuance of the relevant document (invoice).

We keep your personal data for a period of 10 years for as long as required by law, depending on the purpose of the processing.

For more information about your rights, see section 8 of this Policy.

Relevant information about you such as name, email address, title and organization represented provided to trainers. Beyond its employees EUROCERT, may be used as trainers and external individuals. For more information on the transmission of data see section 9 of this Policy.

15. Newsletter

The purpose of data collection is the mission of our newsletter.

The legal basis for this processing is your consent in accordance with Article 6, paragraph 1 (a) of GDPR and the legitimate interests pursued by our ccompany in accordance with Article 6, paragraph 1 (f) of GKPD.

Constitutes a legitimate interest of the company use of email addresses legitimately acquired under the sale of services or other transaction, even when the message recipient has not given their prior consent, provided that is provided to the recipient in a way clear and visible the right to oppose the use of electronic mail address in each message.

We keep your name and your email address to send you our electronic newsletter (e-newsletter) and news regarding services of EUROCERT.

We keep your name and your postal address to send your hardcopy material.

We keep your personal data for as long as required by law, depending on the purpose and type of processing.

We rely on your consent to process the personal data you provide us in order to receive our newsletter. However, you have the right to revoke your consent at any time. In each email refers distinctly and clearly the identity of the sender, as well as the way in which the message recipient may request the termination of communication. For more information about your rights, see section 8 of this policy.

We use the Mailchimp for delivering an electronic newsletter (e- newsletter) and courier companies (Geniki Taxidromiki Courier, ELTA Courier) for sending hard copy material. For more information, visit their privacy policy.

16. Remote Audit

Remote auditing is one of the audit methods described in ISO 19011:2018 Annex A1. Remote audits refer to the use of ICT to gather information, interview an auditee, etc., when “face-to-face” methods are not possible or desired. The security and confidentiality of electronic or electronically-transmitted information is particularly important when using ICT (information and communication technologies) for audit/assessment purposes. Measures to ensure confidentiality and security should be confirmed during the opening meeting.

If ICT is used for audit/assessment purposes, it contributes to the total audit/assessment time as additional planning may be necessary which may impact audit/assessment duration.

Zoom is the video conferencing software apps that is used by EUROCERT's auditors.

Zoom's Privacy Statement is described in the following link:
https://explore.zoom.us/en/privacy/

Zoom's security measures are described in the following link:
https://explore.zoom.us/en/trust/security/

17. Persons Certification ELOT EN ISO / IEC 17024

The purpose of collecting such data is to effectively carry out the certification.

The legal basis on which we base the processing of your personal data is Article 6, paragraph 1 (b) of GDPR, which concerns the processing required for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

To conduct the validation, we will ask you:
- your contact information such as name, phone, email address, including the name of the organization that may represent,
- evidence of professional experience and qualifications required,
- father's name, Mother's name, identity card number,
- and tax information such as VAT and Tax.

These data are necessary:
- for planning and inform you if there is change of date or cancellation of examinations,
- to demonstrate fulfillment of the professional competence requirements of the associated certification regulation
- to identify the natural person in the conduct of examinations, and
- for issuing the Certificate and the relevant document (invoice).

We keep your personal data for a period of 10 years for as long as required by law, depending on the purpose and type of processing.

For information about your rights, see section 8 of this Policy.

Related identifiable information about you such as name and identity card number provided to the supervisors. Beyond its employees, EUROCERT may be used as supervisors and external individuals. Finally, your files in the folder may be reviewed by the Accreditation Body. For more information on the transmission of data see section 9 of this Policy.

18. Services according to ELOT EN ISO / IEC 17020

The purpose of collecting such data is to effectively carry out the certification.

The legal basis on which we base the processing of your personal data is Article 6, paragraph 1 (b) of GDPR, which concerns the processing required for the performance of a contract to which the data

subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

To conduct the audit, we will ask you:
- the contact details of the owner or representative, such as name, phone, email address,
- and tax information such as VAT and Tax.

These data are necessary:
- for planning and inform you if there is a change of date or cancellation audit,
- to issue and send the audit results (reports or/and certification) and
- for the issuance of the relevant document (invoice).

We keep your personal data for a period of 10 years for as long as required by law, depending on the purpose and type of processing.

For information about your rights, see section 8 of this Policy.

Related information such as contact details provided in the audit team. Beyond its employees, EUROCERT may be used as auditors (or Technical experts) and external individuals. Finally, your files in the folder may be reviewed by the Accreditation Body. For more information on the transmission of data see section 9 of this Policy.

19. Services according to ELOT EN ISO / IEC 17043

The purpose of collecting such data is to effectively carry out the schemes.

The legal basis on which we base the processing of your personal data is Article 6, paragraph 1 (b) of GDPR, which concerns the processing required for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

To carry out the schemes, we will ask you:
- contact details of a representative of the organization, such as name, phone, title, email address.

These data are essential for planning schemes.

We keep your personal data for a period of 10 years for as long as required by law, depending on the purpose and type of processing.

For information about your rights, see section 8 of this Policy.

Records may be reviewed by the Accreditation Body. For more information on the transmission of data see section 9 of this Policy.

20. Services according to ELOT EN ISO 14065

The purpose of collecting such data is effectively carrying out the verification.

The legal basis on which we base the processing of your personal data is Article 6, paragraph 1 (b) of GDPR, which concerns the processing required for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a

contract.

To perform the verification, we will ask you:
- contact details of the owner and / or representative, such as name, phone, email address.

These data are necessary:
- for planning and inform you if there is a change or cancellation date of the verification, and
- to inform the relevant report.

We keep your personal data for a period of 10 years for as long as required by law, depending on the purpose and type of processing.

For information about your rights, see section 8 of this Policy.

Related information such as contact details provided on the Audit Team. Beyond its employees, EUROCERT may be used as inspectors and external individuals. The final report shall be notified to the Ministry of Environment and Energy and files of inspection in the folder may be reviewed by the Accreditation Body. For more information on the transmission of data see section 9 of this Policy.

21. Services according to ELOT EN ISO / IEC 17021-1

The purpose of collecting such data is effectively carrying out the certification of the organization.

The legal basis on which we base the processing of personal data is:
- Article 6, paragraph 1 (b) of GDPR, which concerns the processing required for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract,
- Article 9 paragraph 2 (h) for assessing the working capacity of the employee.

Before the audit, we will ask you:
- the representative contact information such as name, title, telephone number, email address,
- the consultant's contact information, such as name, title, telephone number, email address.

These data are necessary:
- planning the inspection and inform you if there is a change or cancellation date of the audit.

During the audit, requested:
- the establishment plan for verifying the number of employees,
- organizational chart and job descriptions,
- professional competence evidence of the organization's employees as diplomas, certificates, education certificates,
- health data, such as health certificates to sanitary and / or suitability assessments by occupational physicians for the assessment of working capacity of workers and compliance with legal requirements,
- health data, such as managing accidents when required (eg OHSAS),
- criminal records data when required (eg ISO 37001),
- financial information workers when required (e.g. SA8000).

In addition:

- data through interviews with staff and
- Data stake keepers (customers, suppliers, subcontractors, authorities, etc.) that may affect the outcome of the assessment management system through control of processes such as the management of complaints, the survey of customer satisfaction, control of external providers, the evaluation of suppliers etc.

We keep your personal data for a period of 10 years for as long as required by law, depending on the purpose and type of processing.

For information about your rights, see section 8 of this Policy.

Related information such as contact details provided on the Audit Team. Beyond its employees, EUROCERT may be used as auditors and / or technical experts and external individuals. Finally, the file of the audit may be reviewed by the Accreditation Body. For more information on the transmission of data see section 9 of this Policy.

22. Products and Services Certification ELOT EN ISO / IEC 17065

The purpose of collecting such data is the efficient conduct of Certification.

The legal basis on which we base the processing of personal data is:
- your consent in accordance with Article 6, paragraph 1 (a) or GKPD
- Article 6, paragraph 1 (b) of GDPR, which concerns the processing required for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

Before the inspection, we will ask you:
- the representative contact information such as name, title, telephone number, email address,
- the consultant's contact information (certification consultant, crop protection consultant, internal auditor, supervisor cultivation etc.), such as name, title, telephone number, email address,
- when required, harvesting / production data (product, quantity, location, acres or hectares, etc.) and data producers (name, postal address, email address, ID or passport number, VAT number, Tax).

These data are necessary:
- planning the inspection and inform you if there is a change or cancellation date of the inspection.

During the inspection, when required e.g. when classifying accommodation, will be required:
- the establishment plan,
- professional competence evidence of the organization's employees as diplomas, certificates, education certificates.

In addition:
- data through interviews with staff and
- Data stake keepers (customers, suppliers, subcontractors, authorities, etc.) that may affect the result of certification.

We keep your personal data for a period of 10 years for as long as required by law, depending on the purpose and type of processing.

For information about your rights, see section 8 of this Policy.

Related information such as contact details provided on the Audit Team. Beyond its employees, EUROCERT may be used as inspectors and external individuals. Also, the inspection of files in the folder may be reviewed by the relevant Accreditation Body. Finally, when required by the contractual, statutory and regulatory requirements that are committed to keep Carry transmitted data carriers such as Chamber of Hotels (accommodation classification service), the ELGO - Dimitra, public authorities and services such as parts of Peripheral Modules in certification of organic products and platforms concerned actors (eg Globalgap).

For more information on the transmission of data see section 9 of this Policy.

23. Verification of Corporate Social Responsibility – Sustainability management & Social Compliance audits

The purpose of collecting such data is effectively provide services in the field of independent verification as well as assurance of the accuracy and reliability of the information contained in the Corporate Social Responsibility reports.

The legal basis on which we base the processing of personal data is:
- Article 6, paragraph 1 (b) of GDPR, which concerns the processing required for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract,
- Article 9 paragraph 2 (h) for assessing the working capacity of the employee.

Before the audit, we will ask you:
- the representative contact information such as name, title, telephone number, email address,
- the consultant's contact information, such as name, title, telephone number, email address.

These data are necessary:
- planning the inspection and inform you if there is a change or cancellation date of the audit.

During the audit, requested:
- the establishment plan for verifying the number of employees,
- organizational chart and job descriptions,
- professional competence evidence of the organization's employees as diplomas, certificates, education certificates,
- health data, such as health certificates to sanitary and / or suitability assessments by occupational physicians for the assessment of working capacity of workers and compliance with legal requirements,
- health data, such as managing accidents when required,
- criminal records data when required,
- financial information workers when required.

In addition:
- data through interviews with staff,
- data stake keepers (customers, suppliers, subcontractors, authorities, etc.) that may affect the outcome of the assessment management system through control of processes such as the management of complaints, the survey of customer satisfaction, control of external providers, the evaluation of suppliers etc and

- data for verification of the auditor's presence on site.

We keep your personal data for a period of 10 years for as long as required by law, depending on the purpose and type of processing.

For information about your rights, see section 8 of this Policy.

Related information such as contact details provided on the Audit Team. Beyond its employees, EUROCERT may be used as auditors and / or technical experts and external individuals. Finally, the file of the audit may be reviewed by the Accreditation Body. For more information on the transmission of data see section 9 of this Policy.