

# Declaration of Customers' Personal Data Protection and Security Policy

Security and privacy of Personal Data are a high priority for the firm **CONDOREX CONSULTING SERVICES LTD**. The purpose of the present Declaration of Personal Data Protection and Security Policy is to explain how and why we use and process your Personal Data as well as to inform you about our privacy practices. Please read it carefully.

## 1. Introduction

This Personal Data Protection Policy has been created in accordance with the provisions of Regulation (EU) 2016/679 (hereinafter "Regulation") of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data. Through this Personal Data Protection Policy we inform you about which information (hereinafter "Personal Data") we collect from you, why it will be used, with whom we will share this information, and which security procedures we have applied for the protection of Personal Data.

Personal Data is the information that can be associated with your identification as a natural person. Processing is the execution of any work or set of work in Personal Data, including: a) collecting, recording or maintaining data, b) organizing or modifying data, c) retrieving, searching or using data, d) disclosing data to a third party (including publication), d) deleting or destroying data.

Your Personal Data is processed and controlled by the firm **CONDOREX CONSULTING SERVICES LTD** (hereinafter "Firm", "We" and "Us"), **Falirou 15, Athens, 11742, Greece**.

Your Personal Data is collected following your explicit consent (in order that we are able to fulfil our contractual obligation towards you) for specified, explicit and legitimate purposes and is not subjected to further processing in a manner incompatible with those purposes (Article 5 par. 1b of Regulation (EU) 2016/679).

In this contractual relation in which you are the Subject of Personal Data (hereinafter "You" or "Visitor"), the Firm operates either as a Data Controller or as a Processor (Article 4 of Regulation (EU) 2016/679).

## 2. Principles of Processing we follow

Having as a primary concern the protection of the Personal Data and the information We manage, we adopt a detailed Personal Data Security and Protection Policy aiming to:

- Ensuring the trust of our customers, employees and suppliers
- The protection of information and Personal Data we process
- Compliance with the Regulation on security and data protection issues

In this context, when processing Personal Data we follow the following basic principles of:

**2.1 Lawfulness, Fairness and Transparency:** We collect your Personal Data solely in a fair, legal and transparent manner. We subject your personal data to lawful and fair processing and we keep full transparency towards you regarding the way we handle them.

**2.2 Purpose limitation:** we collect and process your Personal Data only for specified, explicit and legitimate purposes, as listed in this policy and we do not subject them to further processing in a way incompatible with these purposes.

**2.3 Minimizing Data:** We limit the collection of your Personal Data only to what is directly relevant and necessary for the purposes for which it was collected. We process your Personal Data only to the extent that it is appropriate and relevant to the above purposes, while limiting this processing to the measure necessary for those purposes.

**2.4 Accuracy:** We make reasonable efforts and with your help, in order for the Personal Data under processing to be accurate and, where necessary, updated in relation to the purposes of the processing, taking all reasonable steps for the immediate deletion or correction in the event of inaccuracy.

**2.5 Limitation of retention time:** We keep your Personal Data in a manner consistent with applicable laws and regulations regarding the protection of Personal Data and not for longer than is necessary for the purposes for which it has been collected.

**2.6 Integrity and Confidentiality:** We process Personal Data in a manner that ensures their security inter alia, their protection against unauthorized or unlawful processing and accidental loss, destruction or damage, using appropriate technical or organisational measures.

2.6.1 We do not intend to further process the Personal Data for a purpose different than that for which it was collected.

2.6.2 Subject to what is stated in the present policy, we do not disclose and transmit Personal Data to third parties without your consent unless permitted by law or by our contract.

2.6.3 We inform you that we do not transmit Personal Data to a third country or international organization, for which there is no adequacy decision of the European Commission in accordance with the Regulation EU 2016/679.

2.6.4 We do not take decisions which may have a significant impact on you, including profiling, in an automated manner (decision making exclusively using electronic system without human involvement)

**2.7 Accountability:** We fully abide by the applicable legislation and comply with all of our obligations arising therefrom as resulting from the "Data Controller" law.

In order to protect and secure your data, our company has defined a security plan, policies, procedures, technical and organizational measures, as well as specific roles and responsibilities for its personnel in order to achieve maximum protection of the Personal Data We process for You.

### 3. Which Personal Data we collect and process

For the assignment of brokerage for the sale or rental of a property and/or for the expression of interest in buying or renting through Us:

- Personal Details (Surname, Name, Profession, VAT number, Tax Office, National ID or Passport Number, Issuing Authority, Father's name, Spouse's Name),
- Contact details (E-mail, Address, City, Country of residence, Postcode, Mobile Phone, Fixed Telephone, Fax, Skype, Web, Company Details),
- Banking & Financial Data (Bank Accounts or debit or credit card numbers if transactions are made via POS).

In addition to the assignment of brokerage for the sale of a property, we process the following details of property that possibly contain Personal Data for identification:

- Property address, google earth file (.kml), newspaper announcement, building permit, release, affirmation of integrity, affirmation of archaeology, street affirmation, parental benefit, forest range decision, finality of forest range, public will, block plan, inter-estate command, distribution of property, court decision, corrective contract, public right of way, corrective policy, transit passport, donation in life, living donation, E9, affidavit of mortgage redemption, market segment payment, GNT0-approval, investment proposal, private agreement, determining of seashore-beach, inheritance without acceptance, inheritance with acceptance, topographical map, death certificate, brokerage order, legalization, settlement, legalization document, views, top views, sections, sale proxy, next of kin' status, court records, implementation act, repayment act, limits recognition contract, purchase contract, vertical ownership recommendation, condominium recommendation, owner identity.

Processing special categories of personal data: EU Regulation 2016/679 defines special categories of data that need to be processed according to stricter procedures, such as health data, ethnic origin, religious beliefs, etc. The processing of such data is done only when they are given to us by You, possibly as part of a request of yours (e.g. food allergies) or if required by applicable laws or regulations.

### 4. Way of collection and source Personal Data

The collection of your personal data is usually done by You, but your Personal Data may also be collected by other sources as the ones below:

- By real estate agents, business partners, and third-party systems (e.g. real estate services).
- By third-party companies/websites offering online real estate services.

### 5. For what purposes we collect and process Personal Data

We process and use your personal data for one or more of the following purposes:

- For the execution of the contract between us and in order to fulfill your contractual obligations, such as the provision and completion of the brokerage (exclusive and non) for sale or rental of property, including payment management, provision and completion of the contractual service through the brokerage order – interest in buying or renting property, as well as mediating in additional services that you may request (e.g., contract preparation, title checking, etc.).
- For intermediary support to requests that you submit.
- For handling requests that you have submitted and responding to specific requests that you may submit.
- To provide personalized information and services during your brokerage assignment or brokerage order.
- In order for us to be able to contact you.

- For communication with you and handling discontent, comments, complaints, incidents or emergencies during your brokerage assignment or brokerage order.
- For your security, protection and in order to avoid unlawful actions against you.
- To protect your vital interests.
- To protect your vital interests.
- For direct marketing actions such as newsletters and promotional communications for new products and services or other offers that we believe may be of interest to you through physical mail, email, mobile devices or social networks (with your consent).
- For direct marketing actions by publishing photos and videos in electronic or printed media (with your consent).
- To manage your communication requests through the channels provided for this purpose.
- To evaluate the effectiveness of the promotion and advertising campaigns of the Firm.
- To improve Visitor's experience, Firm's and business partners' operation, development of new products and services, and review and improvement of current products and services and promotional activities through information provided by your reviews and ratings.
- To defend the legitimate interests of the Firm (or third party) provided that these interests are not outweighed by the interest or fundamental rights and freedoms of the Visitor.
- To comply with the legal framework that obliges the Firm to keep and process specific categories of personal data such as compliance with legitimate requests from law enforcement authorities such as the police or tax authorities.
- To identify, investigate and prevent fraud and other illegal activities. For these purposes, personal data may be shared to third parties, such as law enforcement authorities, and external consultants.
- To protect the Public Interest.

Your personal data will be used solely for the purposes for which it has been collected or for purposes compatible with the original. If your personal data is required to be used for any other purpose, you will be informed and notified of the legal basis on which the processing will be based or your consent may be requested.

In any case, your personal data is processed in accordance with the principles hereof and the rules of the Personal Data Protection Legislation and EU Regulation 2016/679.

## 6. Who we share your Personal Data with

We keep the Personal Data we collect from You in confidence. We are not to sell, rent, market or lease your Personal Data to others. We do not disclose any Personal Data we collect for You except for the cases described in this Declaration of Personal Data Protection and Security Policy or in separate notices provided in relation to specific activities.

We may disclose Personal Data relating to You:

- To comply with the applicable law, including laws outside your country of residence.
- To comply with a legal provision or legal procedure.
- To respond to requests from public and state authorities, including authorities outside of your country of residence, and respond to national security or law enforcement requirements.
- To deal with emergencies.
- To the Personal Data Protection Authority, in the event of an occurrence of Personal Data breach.
- When we believe that disclosure is necessary or appropriate for the prevention of bodily injury or economic loss or in connection with investigation of suspected or actual fraudulent or illegal activity.

In the context of its operation, the Firm may transmit certain Personal Data to its personnel and to third parties including credit institutions, tax authorities, accountancy agencies, travel agents, suppliers, co-operating private insurance companies, doctors, lawyers, health care providers, maintenance providers, various service providers, etc., with the necessary confidentiality for the protection of Personal Data.

We also retain the right to transfer Personal Data in the event that we sell or transfer all or part of our Firm or assets (including cases of reorganization, dissolution or liquidation).

Specific data may be transmitted to your relatives after your prior consent or in an emergency.

## 7. For how long we store Personal Data

Our policy focuses on minimizing the processing time of your Personal Data. In other words, we make sure to delete your data if the processing goal has been performed. Many times, however, current legislation and our legitimate interest require that they be kept. In any case, we ensure the security and protection of Personal Data.

In addition, depending on the quantity, nature and sensitivity of the personal data, as well as the purposes for which we process them, we determine the time of the appropriate retention period.

Personal data that are required to be retained by the existing tax legislation will be retained for 10 years. Upon the advent of the aforementioned time period, the Personal Data will be deleted and destroyed.

## 8. Your rights with respect to the protection of Personal Data.

The Regulation gives you the following rights, which you can exercise free of charge and based on what is set out by the legal framework:

**8.1 Access right:** be informed about which personal data we have collected from You and are processed by Us, their origins, the purposes and the legal basis for processing them, any recipients or recipient categories of personal data.

**8.2 Right to correct** any inaccurate Personal Data in order to make it accurate.

**8.3 Right to complete** any incomplete Personal Data in order to make it complete.

**8.4 Right to Delete** your Personal Data in the following cases:

8.4.1 When Personal Data is no longer necessary in relation to the purposes for which it was collected or otherwise processed,

8.4.2 When you withdraw your consent on which the processing of Personal Data has been based and there is no other legal basis for the processing,

8.4.3 When Personal Data has been processed without the necessary legal basis,

8.4.4 When the obligation to delete the Personal Data is provided for by law.

**8.5 Right to limit the processing** of Personal Data in the following cases:

8.5.1 When you question the accuracy of the Personal Data and until its accuracy is verified by Us,

8.5.2 When, instead of deleting, you request the limitation of the processing of Personal Data,

8.5.3 When We no longer need the Personal Data for processing purposes, but are required by You in order to establish, exercise or support legal claims.

**8.6 Right to object to the processing of Personal Data**, unless there are imperative and legitimate grounds for processing which outweigh your interests, rights and freedoms or for the establishment, exercise or support of legal claims by Us.

**8.7 Rights to data portability:** to receive the Personal Data we have collected from You in a machine-readable format and send them to another person responsible for processing.

**8.8 Right to withdraw at any time the consent** (without retro-active effect) that you have provided.

For more information on the conditions for exercising your rights, and your right not to be subject to automated decision-making procedures, you can contact the controller directly at [info@condorex.eu](mailto:info@condorex.eu) for the exercise of your rights, as well as for any other information. The request for exercising the rights is free of charge unless the request is manifestly unfounded or excessive.

## 9. How to lodge a complaint

If you believe that the Personal Data protection is affected in any way, you may appeal to the Personal Data Protection Authority: 1-3 Kifissias Str., 115 23 Athens, [www.dpa.gr](http://www.dpa.gr). tel.: +30 2106475600, email: [contact@dpa.gr](mailto:contact@dpa.gr)

You also have the right to appeal to the competent judicial authorities for the protection of Personal Data.

## 10. Communication

You can contact us at the following address:

**CONDORX CONSULTING SERVICES LTD, Falirou 15, Athens, 11742, Greece, Tel.: +30 2152159905**

If you have any questions regarding the processing of Personal Data, whether you wish to exercise any of your rights, or make a complaint regarding your Personal Data, you may contact our controller either by telephone or by letter to our address under the heading For Controller or at the e-mail: [info@condorex.eu](mailto:info@condorex.eu)

## 11. Other information you need to know

This Personal Data Protection Policy has been reviewed and published by the Firm from **01/2021**. We may, at our absolute discretionary power, revise the Personal Data Protection Policy at any time (the particular version becomes effective as soon as it is published). Changes to the Personal Data Protection Policy will apply to the information collected, from the date of publication of the revised version, as well as to the existing information we hold.