

## **PRIVATE DATA PROTECTION POLICY FOR SUPPLIERS - ASSOCIATES - CUSTOMERS**

The purpose of this Policy is to define the basic principles and rules according to which the company under the corporate name “**INTRACOM DEFENSE SINGLE MEMBER S.A.**”, with the distinctive title “**IDE**”, which has its headquarters at 21 km Markopoulou Ave., GR 19441 Koropi, Attica, Greece, (hereinafter referred to as “**the Company**”), collects, processes and stores personal data, as defined by applicable national and EU legislation and specifically by the European Regulation (EU) 679/2016 (hereafter “**the Regulation**” or “**GDPR**”).

The Company processes personal data of its suppliers - associates - customers according to GDPR.

This policy defines the principles applied by the Company when processing these data (categories, legal basis, purpose, protection measures, rights, etc.) and aims to inform the subjects about the processing. It is posted on our Company website (<http://www.intracomdefense.com>) and can be changed / updated from time to time. You will be informed of all major changes, while the current version will be posted every time on the Company's website.

We assure you that all information we collect about you, are confidential, and will be used only for the legitimate purpose of collection and are protected fully and adequately in accordance with the Company's processing principles and protection measures.

### **CATEGORIES OF DATA WE COLLECT**

We process the following categories of personal data (total or part of them, depending on the type of collaboration / contract) of our associates / suppliers / customers:

- For individuals / traders: Basic identification (first name, surname, father's name, date of birth, place of birth, gender, nationality, address, telephones, e-mail, business address, VAT number, IRS, Identity Card Number, Passport Number) distinctive name/enterprise form, head office, bank accounts, Social Security Number (AMKA), Single Security Entity (EFKA) Number and other register numbers of social insurance institutions, education, training and work experience data.
- Basic identification data of legal representatives, authorized attorneys, project managers, etc. (name, surname, father's name, address, telephones, e-mail addresses), education, training, work experience
- Tax and insurance clearance information,
- Financial data (e.g., payments, invoices, etc.).

- In exceptional circumstances, when required by applicable law, the Company may collect and process data relating to criminal convictions or offenses, such as copies of a criminal record, always respecting the principle of proportionality.

#### **PURPOSE FOR WHICH WE PROCESS YOUR PERSONAL DATA**

We process your personal data in order to prepare, execute, operate and terminate the contract between us and, in general, manage our relation (contracts, invoices, payments, etc.), but also to comply with our obligations towards the Law (Income Tax Code, etc.), as well as for the legal foundation of its claims or the defense of claims against it before Courts, Authorities, etc.

#### **LAWFULNESS OF PROCESSING**

Processing is lawful for at least one of the following reasons as appropriate:

- a) The legitimate interest we seek (operation of our Company),
- b) Compliance with obligations under the law,
- c) The execution (preparation, operation, termination) of the contract between us,
- d) Your consent.

#### **WHERE WE DISCLOSE YOUR PERSONAL DATA**

The Company does not disclose your personal data to third parties but only to its authorized employees that process them in a manner that ensures appropriate security and absolute confidentiality. Exceptionally, your personal data may be shared:

- a) To public authorities for the purposes of compliance of the Company with its legal obligations,
- b) Third parties providing services to the Company, such as lawyers / law firms (in the case of out-of-court or legal action in relation to legal claims of the Company or against it). Those persons acting as processors on behalf of our Company are bound by warranties of absolute compliance with applicable laws (European and National) on personal data, and
- c) Before the courts for exercising and defending the rights of the Company.

#### **PRINCIPLES OF PROCESSING AND PROTECTION MEASURES**

Our Company, indicatively but not limited to:

- process only your personal data which is necessary for these purposes and only for those purposes,
- take appropriate technical and organizational measures for the security of personal data (ensuring confidentiality, integrity and availability) from design and by definition,

- owns and applies procedures and systems for the confidentiality of the processing of personal data, as well as for their protection against accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access and any other form of unfair processing (such as use of access control tools and data loss prevention),
- has informed the data subjects (citizens and employees), according to GDPR
- maintains the principle of personal data minimization,
- takes care of the exercise and satisfaction of the rights of the subjects,
- has drawn up the documents, policies and procedures that demonstrate its compliance in accordance with the principle of accountability (privacy policy, registration of the type, categories and flows of personal data, drafting of processing records, impact assessment, etc.) in GDPR,
- ensure that staff involved in the collection and processing of personal data are adequately informed and trained, taking into account the available training and information methods in order to select the most appropriate ones for each occasion.

#### **TIME PERIOD THAT YOUR OWN PERSONAL DATA WILL BE STORED**

We store your personal data for the time required by the law for which the Tax Office, the Single Social Security Entity (EFKA) etc have the right to inspect our Company.

Unless a shorter period of time is provided by law, these data are stored for up to twenty (20) years, which is equal to the general limitation period.

If there is an ongoing pending trial, we will keep your data for five (5) years from the final court order.

When processing your personal data is no longer necessary, your data will be destroyed in a secure and proven manner.

#### **WHAT ARE YOUR RIGHTS AND HOW TO EXERCISE THEM**

You have the following rights:

- a) to Know what personal data we keep and process, the data course, the purposes of processing, the envisage period for which the data will be stored (**right of access**);
- b) to Ask for the correction and / or completion of your personal data so that it is complete and accurate (**right of rectification**). You will have to produce any necessary documents that may indicate the need for correction or completion;
- c) to Require restriction of the processing of your data (**right to restriction of processing**);
- d) to Refuse and / or object to any further processing of your personal data we observe (**right to object**);

- e) to Claim to transfer your personal data to any other controller of your choice (**right to data portability**);
- f) to Ask for the erasure of your personal data from the files we hold (**right to be forgotten**).

In relation to the exercise of your rights, note the following:

- The Company may in any case have the right to refuse the satisfaction of your request to restriction of the processing or erasure of your personal data or your opposition to processing if the processing or maintenance of the data is necessary for the foundation, exercise or support of legitimate its rights or the fulfillment of its obligations.
  - Exercising the right to portability does not mean deleting your data from our records, which is subject to the terms of the immediately preceding paragraph and the conditions of the Regulation.
  - The exercise of these rights is for the future and does not concern data processing already performed.
- g) To Lodge a complaint to the Personal Data Protection Authority ([www.dpa.gr](http://www.dpa.gr)) if you believe that your rights are being infringed in any way (**right of complaint to the Authority**).

For the exercise of your above rights, you may contact the Company in writing (INTRACOM DEFENSE SINGLE MEMBER S.A., 21 km Markopoulou Ave., GR 19441 Koropi, Attica, Greece), or electronically (e-mail) at [Privacy@intracomdefense.com](mailto:Privacy@intracomdefense.com).

The Company will make every effort to respond to your request (s) within thirty (30) days of submission of the request or requests. This period may be extended for up to sixty (60) additional days if this is deemed necessary at the absolute discretion of the Company, after you have been informed in due time.