



PALEOLOGOS S.A.

5, 25th AUGUST STREET

71202 HERAKLION, CRETE

GREECE

Personal Data Protection Policy

Date of entry into force of this policy May 17, 2018

The primary objective of this policy is to provide general guidelines regarding the protection of **Personal Data** (collection, use, disclosure, monitoring, etc.) by the Company

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Websites: www.paleologos.gr www.ferries.gr tickets.ferries.gr www.greekislands.gr
www.greek-islands-ferries.gr www.cruisinggreece.com www.ferries.info
www.camping-in-greece.gr

1. Purpose of this policy

This policy explains that **PALEOLOGOS S.A., 5, 25th AUGUST STREET, 71202 HERAKLION, CRETE, GREECE** (hereinafter referred to as the “Company”) may collect data about its customers and use it to satisfy customer and regulatory requirements.

It also outlines the security measures taken by the Company to protect data privacy and it guarantees the Company will not do certain things.

2. Legal and regulatory framework

The use and protection of the personal data of the visitor/user of Company-provided services is subject to the conditions set forth in this section and the relevant provisions of Greek Law (Law 2472/1997) for the protection of individuals with regard to personal data protection as supplemented by the decisions of the Chairman of the Commission on Personal Data Protection, PD [Presidential Decree] 207/1998 and 79/2000 and Article 8 of Law No. 2819/2000) and the new European General Data Protection Regulation (GDPR: 2016/679 of the European Parliament and of the Council of 27 April 2016, <http://eur-lex.europa.eu/legal-content/EL/TXT/HTML/?uri=CELEX:32016R0679&from=EN>).

The conditions herein are formulated in view of the rapid development of technology, and particularly the internet, as well as the existing – albeit not fully developed – set of legal regulations relating to these issues.

In this context, any future relevant regulation will be the subject of this section.

In each case the Company reserves the right to change the terms of personal data protection, after informing the visitors/users, within the existing or potentially new legal framework.

If a visitor/user does not agree with the terms of personal data protection provided for in this section s/he should refrain from using the Company's services.

3. Commitment

The Company considers the privacy and data protection of its customers to be of utmost importance and is committed to providing all its customers personalized services that meet their requirements in a manner that safeguards their privacy.

4. Collection and processing of personal data

The Company manages and processes your personal data in full compliance with the relevant articles of GDPR (5, 6, 7, 8, 9, 10, 11, etc.).

With particular regard to Article 5 (Principles relating to processing of personal data) the Company takes appropriate measures to ensure that the personal data are:

- a) processed lawfully, fairly and in a transparent manner in relation to the data subject (“lawfulness, fairness and transparency”);
- b) collected for specified, explicit and legitimate purposes and not processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes (“purpose limitation”);
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (“data minimization”);
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (“accuracy”),

e) 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1), subject to implementation of the appropriate technical and organizational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject (“storage limitation”);

f) are processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures (“integrity and confidentiality”).

Some of the data that the Company holds about you may be sensitive personal data, within the meaning of the data protection law and other relevant laws.

The Company may collect personal data about you from various sources, including:

- (a) from you when you agree to use one of our Company’s services, and in such a case it may include your personal and/or business contact information and your consent,
- (b) from you when you contact our Company with a request for information, and
- (c) from publicly available sources.

5 Types of personal data we collect

When you interact with the Company, we may ask you or we may obtain certain data with your consent, such as:

- Your name,
- Your email address,
- Your telephone number,
- Your gender,
- Your age,
- Information about the products and services you have purchased,
- Your use and activities on the Company webpages,

We also may collect personal data through cookies or similar techniques such as:

- Your IP address,
- Your cookie ID,
- Your browser,
- The webpages that you visit on our sites

6. Intellectual and industrial property rights

Other than the expressly mentioned exceptions (copyright of third parties and affiliates), all the Company content including images, graphics, photographs, drawings, texts, services and generally all files of this website, are intellectual property, trademarks and Company service marks and are protected in accordance with the relevant provisions of Greek law, European law, and international treaties.

Consequently, none of the above can be in whole or in part sold, copied, modified, reproduced, republished, or downloaded, transmitted or distributed in any way.

7. Use of data

The data that you provide to the Company or that the Company holds may be used by the Company:

- (a) to identify you when you ask questions,
- (b) to help us manage and communicate with you regarding improving the management of services and products provided by the Company in the past, present or in the future,
- (c) to carry out marketing analysis and to create customer profiles and generate statistical data,
- (d) to help the Company prevent and detect fraud or loss, and
- (e) to contact you by, all means (including mail, email, telephone, etc.), regarding other services and products offered by the Company, and authorized selected affiliates.

8. Credit check

The Company, in certain cases, may perform credit checks through the appropriate entities where necessary when you request a service or product.

9. Use of email

To grant the visitor / user of email address access to certain Company services the following data is requested:

- (a) Full name,
- (b) Address – Zip code – Telephone number – City – Country, and
- (c) Email address

This data is not disclosed to third parties.

The Company maintains a file with the above email addresses and may send informational messages to the email address owners only with their consent.

10. Data disclosure

In no case does our Company distribute your personal data to third parties (Article 11, Law No. 2472/1997) and in accordance with the new European General Data Protection Regulation (GDPR: 2016/679 of the European Parliament and of the Council of 27 April 2016).

In no case does it sell, transmit or rent your personal data to third parties.
These data are used exclusively by our Company to constantly improve how we serve you.

The Company may disclose the data only if lawfully requested for legal or regulatory purposes, in legal proceedings or potential legal proceedings.

11. Protection of data

The Company maintains strict security and control measures to protect your personal data.

This includes in accordance with GDPR (Articles 5, 28, 30, 32, 33, 34, 40, 55 – 58, etc.) a series of administrative measures, security policies, procedures and practices to verify your identity when you call us, data encryption on our web pages, creation of backup of data in locations outside the Company, etc., in order to ensure compliance with all the applicable legal requirements.

12. Access to the Internet

If you contact the Company via the Internet, then we may, if you give us consent, occasionally use e-mail to contact you regarding our services and products.

Please be aware that communications over the Internet, such as emails, etc., are not secure unless they have been encrypted.

The Company assumes no responsibility for any unauthorized access or loss of personal data that is beyond the Company's control.

We may use cookies to track user activity on our Company website.

You can usually change your browser settings to block cookies.

However, blocking cookies may affect your ability to use some of the products and/or services on our Company website.

13. Monitoring of communications

All Company communications with you (including telephone conversations, e-mail, etc.) may be monitored and recorded by the Company for security, quality assurance, and legal, regulatory and training purposes.

14. What are your rights?

In accordance with the Law No. 2472/97, and the new European General Data Protection Regulation (GDPR: 2016/679 of the EUROPEAN PARLIAMENT and of the COUNCIL of 27 April 2016, as applicable, you have the right to information, access, erasure, portability, rectification and objection (Articles 15 to 22 of GDPR). That is, you have the right to receive, upon request, free information about stored personal data relating to you. Further you have the right, upon request, to raise objections to the processing of data that relate to you, with effect for

the future. In addition you have, in accordance with the legal provisions, right of rectification, and erasure of such data.

MORE SPECIFICALLY

You may exercise, as appropriate, the following rights:

- the right to access, so as to learn which of your data we process, what the purpose is and who the recipients are (GDPR Article 15 “Right of access by the data subject”);
- the right to rectification, so as to rectify any incompleteness or inaccuracies in your data (GDPR Article 16 “Right of rectification”)
- the right to erasure (right to be forgotten), for your personal data to be erased from our files, provided that their processing is no longer necessary (GDPR Article 17 “Right to erasure (‘right to be forgotten’)”)
- right to restriction of processing, in the event that the accuracy of your data is in question (GDPR Article 18 “Right to restriction of processing”)
- the right to be informed of any rectification or erasure of personal data or restriction of data processing that is carried out in accordance with Article 16, Article 17(1) and Article 18 (GDPR Article 19 “Notification obligation regarding rectification or erasure of personal data or restriction of processing”)
- the right to portability, to receive your data in a structured and commonly used format (GDPR Article 20 “Right to data portability”)
- the right to object, especially if you do not wish your data to be used for purpose of direct marketing of our products and services, including objections to profiling (GDPR Article 21 “Right to object” and GDPR Article 22 “Automated individual decision-making, including profiling”).

To exercise your rights, please send a request to the Company’s **Data Controller as detailed below.**

The Company is committed to provide, to the extent technically feasible, automated means for exercising your rights and to act to satisfy your requests in principle free of charge, unless your requests are often repeated and due to their volume they impose on us administrative costs, for which you will be charged.

The Company will make every effort to respond to each relevant request by you within thirty days of its receipt. However, in the event that the complexity of your request or the volume of information makes it impossible for us to fulfill your request within 30 days, the Company will inform you in writing within the above deadline of the reasons for the delay and will make every possible effort to satisfy your request as soon as possible and in any case within two additional months.

The Company reserves the right not to satisfy your request if it is deemed manifestly unfounded or excessive and will inform you regarding the reasons for the failure to satisfy it.

In any case, you have the right to lodge a complaint to the Personal Data Protection Authority, which can accept relevant complaints submitted either in written form in its office (Kifisias 1-3, 115 23, Athens) or electronically (www.dpa.gr).

In the event that you have given your consent to receive the newsletter, you can revoke it at any time and select to stop receiving the newsletter by sending an email to info@ferries.gr with “Stop receiving email newsletter” in the subject line.

15. Applicable law and other terms

The Company’s terms and conditions of use set out above, and any modification, change or alteration are governed and supplemented by Greek law, European Union law and the relevant international treaties.

If any provision of the above conditions is contrary to law it ceases to have effect and is withdrawn from herein, without in any way affecting the validity of the other conditions.

This constitutes the entire agreement between the Company and the visitor/user of its pages and services and is binding only on them.

No modification of these terms should be taken into account and be a part of this agreement, unless expressed in writing and incorporated into this agreement.

16. Cookies policy

For details on the Company's cookies policy, refer to the link below:

https://www.ferries.gr/CookiesPolicy_en.pdf

17. Contact

If you have any questions about the above referenced policy or the Company's cookies policy or to exercise your rights, please contact us.

Data Controller PALEOLOGOS S.A. ANTONIA ANASTASAKI 5, 25 th AUGUST STREET 71202 HERAKLION, CRETE GREECE + 302810346185 ada.anastasaki@paleologos.gr	Data Protection Officer: DIMITRIS MAKRIS, 5, 25 th AUGUST STREET 71202 HERAKLION, CRETE GREECE + 302810346185 dimitris.makris@paleologos.gr
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