



## GENERAL PERSONAL DATA PROTECTION POLICY - PRIVACY NOTICE

### 1. INTRODUCTION

The present General Personal Data Protection Policy (hereinafter “Personal Data Protection Policy” or “PDPP”) concerns the processing of personal data carried out by 369AV PRIVATE COMPANY (“the 369”).

369 attaches great importance to the protection of personal data. Therefore, it has developed the present Policy, for the purpose of informing the visitors to its website about the processing of the personal data that 369 collects and further processes in the course of its main activities [as per articles 13 and 14 of Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR), hereinafter “GDPR”].

### 2. DEFINITIONS FOR PERSONAL DATA

(N.B.: The definitions are in accordance with art. 4 of the GDPR)

“**Personal Data**” means any information by reference to which a natural person (“data subject”) is identified or identifiable.

“**Controller**” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. In the context of the present Policy, 369 acts as Controller.

“**Processor**” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller.

“**Personal data subject**”: an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“**Recipient**” means a natural or legal person, public authority, agency or other body to which the personal data are disclosed, whether a third party or not. Public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients.



### 3. COLLECTION OF PERSONAL DATA

The types of processing performed in the framework of 369's operation have the following characteristics:



A/A	PROCEDURE	CATEGORIES OF DATA SUBJECTS	PERSONAL DATA	PURPOSE	SOURCES	RECIPIENTS (external to the Company)	RETENTION PERIOD
1.	<b>Commercial Transactions with Suppliers</b>	(A) Suppliers (C) Legal Representatives of Suppliers	(a) first name, (b) surname, (c) father name, (d) address, (e)email address, (f) phone number, (g) Tax Registration Number (AFM), (h) professional capacity, (i) bank details	Conclusion and performance of the Supply Contracts	The data subjects themselves.	A) Email and cloud provider, B) IT Company, C) Tax/accounting advisors D) Accounting platform provider	20 years after collection, unless further retention of data is deemed necessary for the purpose of establishing, exercising or supporting a legal claim. Invoices are retained for 5 years in accordance with the relevant legislation.
2.	<b>Commercial</b>	(A) Clients	(a) first name, (b)	Conclusion and	The data	A) Email and	20 years after



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	<b>Transactions with Clients</b>	(B) Legal representatives of the Clients	surname, (c) father name, (d) address, (e)email address, (f) phone number, (g) Tax Registration Number (AFM), (h) professional capacity	execution of a contract between 369 and each Client.	subjects themselves.	cloud provider, B) IT Company, C) Tax/accounting advisors	collection, unless further retention of data is deemed necessary for the purpose of establishing, exercising or supporting a legal claim. Invoices are retained for 5 years in accordance with the relevant legislation.
3.	<u>CVs</u>	Job Applicants	a) Personal details (full name, age, etc.) b) Contact details (mail address, phone	Collection of CVs and implementation of the selection	The Data Subject	A) Email and cloud provider, B) IT Company	6 months after the final selection. This period might be



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			number, email address, etc). c) Details on education and working experience. d) Any other categories of personal data included in the CV.	procedure			extended (2 years after the submission of each CV) in the case where the Data Subjects provide relevant consent.



#### **4. OBSERVANCE OF CONFIDENTIALITY**

The Processors that perform the processing on behalf of 369 have agreed and contractually undertaken to observe confidentiality, not to make personal data accessible to third parties without 369's permission, to take appropriate security measures and, in general, to comply with the legal framework for the protection of personal data.

369 does not, in principle, transfer personal data of the data subjects to a third country or to an international organisation. However, where this is deemed necessary, such transfer shall take place in accordance with the provisions of articles 44 et seq. of the GDPR.

#### **5. TRANSFER AND STORAGE OF PERSONAL DATA**

Any transfer or transmission of the personal data of the data subjects shall take place via suitable electronic systems securing the integrity and prevention of unauthorized access.

#### **6. RIGHTS OF THE DATA SUBJECTS**

In its capacity as Controller, 369, in full compliance with the provisions of the legislation on the protection of personal data, shall satisfy and facilitate the exercise of the following rights of the data subjects, as such rights are provided for by the law:

##### **6.1. Right of access**

The data subjects have the right to receive from 369, at any time, information as to whether or not it processes their personal data and, if it does, they may request to be informed of the purpose of the processing, the type of data that are subject to processing, their recipients, the period during which they shall be stored, the existence of their right to submit a request for the rectification or erasure of personal data or for the restriction of the processing or to object to such processing, and of their right to lodge a complaint with a supervisory authority, if automated decision-making is taking place. In addition, the data subjects shall be provided with a copy of the said personal data without undue delay.

##### **6.2. Right to rectification**

The data subject has the right to require 369 to rectify inaccurate or out-of-date personal data that concern them. It also has the right to require the completion of incomplete personal data,



including, among other means, by an additional declaration. Furthermore, 369 undertakes to communicate any rectification of personal data to any recipient to whom the said personal data have been disclosed, unless this proves impossible or would entail a disproportionate effort. 369 undertakes the obligation to inform the data subject about such recipients upon request.

### **6.3. Right to erasure**

The data subject has the right to request 369 to erase personal data that concern them, under the conditions of art. 18 of the GDPR and art. 34 of Law 4624/2019.

### **6.4. Right to restriction of the processing**

The data subject has the right to request 369 to restrict the processing the personal data that concern them, under the conditions of art. 18 of the GDPR. If the processing of personal data is restricted, such personal data shall, with the exception of storage, only be processed if specific exemptions apply, in accordance with Art. 18 GDPR.

### **6.5. Right to the portability of the data**

The data subject has the right, under the conditions of art. 20 of GDPR, to receive the personal data that concern them and which they have provided to 369 in a structured, commonly used and machine-readable format, as well as the right to transfer such data to another controller without objection from 369 to which the personal data had been provided as Controller.

### **6.6. Right to objection**

The data subject has the right to object at any time and for reasons related to his/her particular situation to the processing of personal data that concern them, under the conditions of art. 21 of the GDPR. If the data subject objects to the processing of data that concern them, 369 shall no longer process such data unless it demonstrates compelling legitimate grounds for the processing which override the interests and rights of the data subject or for the establishment, exercise or defence of legal claims.

### **6.7. Automated individual decision-making, including profiling**

369 does not make use of automated individual decision-making. However, if in the future it adopts automated individual decision-making, the data subject shall in any case have the right to



object to a decision based solely on automated processing, including profiling, where such decision produces legal effects that concern or significantly affect the data subject.

## 7. Satisfaction of the rights

**Overall, the Company ensures that:**

1. Procedures are in place to allow the easy exercise of the rights of the data subjects, so that all necessary actions can be initiated immediately.
2. It shall respond to a request made by the data subject without undue delay and in any event within thirty (30) calendar days at the latest. In the event that it cannot satisfy any right exercised by the data subject, 369 shall ensure that a specific, adequate and complete justification is provided.
3. Except in cases of manifestly unfounded or excessive requests, all actions relating to the satisfaction of the rights of the data subjects shall be carried out free of charge for the data subjects.

For exercising the rights provided for by the law, for the submission of queries or for any other matter related to the processing of personal data described in this privacy notice, data subjects may use the following email address: [office@369av.gr](mailto:office@369av.gr).

In cases where the data subjects consider the processing of their personal data to be in violation of the regulatory framework in force for the protection of personal data, they have the right to lodge a complaint with the Hellenic Data Protection Authority (“HDPA”, 1-3 Kifissias Ave., GR-11523, Athens, tel.: +30 2106467500, e-mail: [contact@dpa.gr](mailto:contact@dpa.gr)).

## 8. Cookies

This website uses “cookies”. Cookies are small pieces of information (files) in plain text format, which are stored on users’ computers (or other devices with internet access, such as smartphones or tablets) when they visit any page on the Internet.

Cookies help collect information which is necessary to measure the effectiveness of a website, improve and upgrade its content, and adapt it to the users’ demand and needs, as well as to measure the effectiveness of the way in which website is presented and displayed on third party websites. The cookies used on this website do not allow the collection of information that identifies the users or the access to any document or file kept on their computers.





The following categories of Cookies are used in this website:

**Necessary**

“Necessary Cookies” help a website function properly by facilitating basic functions such as the users’ navigation and access to secure areas. A website cannot function properly without these cookies.

**9. Amendment of this policy (issue: September 2025)**

369 reserves the right to amend the present Policy, either in whole or in part, when it so deems necessary. Any amendment hereto shall take immediate effect as of its posting on 369’s website. Users are advised to consult the present document at regular intervals, to make sure that they are aware of its most recent issue.