

**PRIVACY AND
PERSONAL DATA PROTECTION POLICY**

GENERAL PROVISIONS

1. Who is responsible for your data?

The Controller of your data is the Company “GR SAMSON FORWARDING S.A.”, (“the Company”), which is located in the industrial area of Sindos, (B.B 61), Thessaloniki, Greece, as legally represented, call center: 2310 723480-1-2 and contact e-mail: info@grsamson.gr.

2. Company’s general principles related to transparent provision of information

2.1. All information provided herein and any information you may request in the future is provided free of charge, provided the request is not exercised repeatedly, excessively or is manifestly unjustified (see more under 2.3).

2.2. For each of the above rights you exercise, the Company will respond within one (1) month from the receipt of your request or, in the event of objective difficulties, complex requests or large volume of requests, the Company will respond within a total of three (3) months at the latest as regards the completion of the request or the reasoned refusal to carry out your request for legitimate reasons expressly laid down in General Regulation 2016/679, in accordance with the relevant internal procedure.

2.3. In the event that the Company considers that any of your above mentioned rights is being exercised in a manifestly unfounded manner or that the request is excessive or is being exercised repeatedly, (the Company) has the right to impose a reasonable charge for the provision of additional information (which is initially free of charge) and to refuse to continue processing the request.

2.4. In the event that the Company has reasonable doubts concerning your identity when you submit a request to exercise any of your above rights, the Company may request the provision of additional information necessary to confirm your identity before processing the request.

2.5. In the event that the Company delays responding to your request beyond the justified period of time and in the event that you believe your rights are being

infringed or that the Company is not consistent with its obligation to safeguard your data, you have the right to lodge a complaint with the supervisory authority (Hellenic Data Protection Authority, Athens, 1-3 Kifissias Street, GR-11523, contact@dpa.gr 210 6475600).

2.6. You retain the right to withdraw the consent (if any) you granted at any time by submitting your relevant request document, as well as the right to address all of your requests for the exercise of your rights below at the email address privacy@grsamson.gr.

3. What are your Rights with respect to the Personal Data you have provided to us?

3.1. Right to Information

You reserve the right to request information in relation to the personal data we have received from you and retain for one or more purposes as described below (under A through C). This text constitutes in its entirety a manual of basic awareness and understanding of the philosophy of the regulatory framework that governs the protection of your personal data. Updates, further explanations, and clarifications regarding this text can be provided to you following a request for the exercise of your right to be informed.

3.2. Right to Access

You reserve the right to request from our Company access to your information that we retain and confirmation as to whether they are being processed, and more specifically, information about the purposes of the processing, the categories of personal data, the recipients or the categories of recipients, the period for which the data will be stored and processed, the right to lodge a complaint with the Hellenic Data Protection Authority, any available information about the origin of the data in the event the data have not been obtained from you, the existence or not of automated decision-making including profiling and the related methodology, safeguards about the policy we follow when transfers to third countries are being carried out, and a copy of the personal data being kept and processed.

3.3. Right to Rectification

You reserve the right to request from our Company rectification of your data in the event that any of the data that we have the right to process has been altered or incorrectly submitted.

3.4. Right to Erasure

You reserve the right to request from our Company the complete or partial erasure of your data that we are entitled to store and process, either because they are no longer necessary for the purposes for which they were collected, or because you withdraw your consent, or because your data were collected for a purpose that you consider illegal. We will reply to you within a reasonable period of time (no more than one month, and under certain conditions, if facing difficulties, no more than three months in total), confirming the complete or partial erasure of your data or the inability to erase certain data, if any law or the performance of a task carried out in the public interest, or the right of freedom of expression and information, or the exercise or defence of any legal claim requires their retention. In this event, you have the right to lodge a complaint with the Hellenic Data Protection Authority and to exercise a judicial remedy.

3.5. Right to Restriction

You reserve the right to request from our Company restriction of the processing of your data, in terms of quantity, time or in relation to the purpose of their processing, and more specifically (a) because you contest the accuracy of your data and for as long as we need in order to verify their accuracy; (b) because you consider the processing to be illegal, and instead of the erasure of the data you opt for its restriction; (c) because its use on our part is no longer needed, but do not desire their erasure as their retention will serve a judicial claim; or (d) in the event that you object to the processing of the data and until it is verified that your rights as a Data Subject override the legitimate reasons for processing the Company.

3.6. Right to Portability

You reserve the right to receive the personal data you have provided us with in a structured, commonly used and machine-readable format, as well as the right to transfer them further without objection, given that the processing is being carried out

on the grounds of consent. In the context of the exercise of this right, you may also request direct transfer from us to the third entity without your own intervention.

This right is exercised under the restrictions of the right to erasure (see above under 3.4) and its exercise shall not adversely affect the rights and freedoms of others.

3.7. Right to Object

You reserve the right to object to the use of your data processed unless the Company demonstrates imperative and legitimate reasons for processing which outweigh your interests or are necessary for the establishment, exercise or support of legal claims.

SPECIFIC PROVISIONS (regarding the individual categories of Personal Data Subjects)

(A) CUSTOMERS – SUPPLIERS – ASSOCIATES and POTENTIAL CUSTOMERS – SUPPLIERS

A.1. Nature of Data - Purpose of processing - Legitimate Basis

a) Your data (name, e-mail address, telephone, home address or business address, capacity, professional activity and / or our products / services of interest, etc.), which are collected pre-contractually, by sending an e-mail or by completing the online contact form on our website or by telephone, are processed for the purpose of investigating the probability of a transaction with our Company in order to pursue our commercial purposes in response to the unsolicited communication.

b) Your data [personal identification (Full name, VAT No, ID No, Social Security No), home address or business address, contact details (phone, e-mail address), bank account number, full billing details, payment information, payment execution information, etc.] which you provide yourself, by telephone, by e-mail and/or in writing, as part of our transaction, are processed for the purpose of implementing our mutual agreement / commercial cooperation relationship and the provision of transport, storage and commodity services, as well as our obligation to comply with labor, insurance and tax legislation.

c) The legitimate basis for the processing of the above data (under A.1.a) is to serve the legitimate interests of the Company for marketing purposes (Article 6 (1) (f) of Regulation (EU) 2016/679, while the legitimate basis for processing the data (under A.1.b) is the performance of the contract between us and our compliance with the law (Article 6 (1) (b) and paragraph 1 (c) of the above).

A.2. Data Transmission - Promotion

a) Your data (made available for the purposes described in A.1.a & b above) is not provided (as it is not required by the purpose for which it is collected) to be transmitted to any organization outside the Company. As a Company – Data Controller, we have taken all the necessary security measures to prevent access to your personal data to anyone other than the persons authorized to do so and only for the purposes of processing. In the context of our business of serving and pursuing our legitimate interests, we may disclose your data in a lawful and lawful manner to external partners of the Company, including, but not limited to, legal advisers, accountants, tax consultants, technical advisers, postal service providers, IT, etc.

These persons only receive the data strictly necessary for the performance of the work they undertake, process them only upon our express mandate and authorization and solely for the purposes stated in this “Privacy and Personal Data Protection Policy”. We ensure that these persons are aware of this and that they respect and apply all European and national legislation on the protection of personal data, even by signing the relevant contractual terms.

b) Your data (made available for the purpose of the purposes described in A.1.a & b) other than those referred to in A.2.a) may also be forwarded to public bodies and services, competent tax authorities or/and to insurance funds, to judicial and independent authorities, as part of our compliance with the relevant legislation.

A.3. Data Retention Period

a) We will retain the above (under A.1.a) your data for the period of ten (10) years to serve our commercial purposes and then we will erasure them.

b) We will retain your above-mentioned data (under A.1.b) that have a financial, insurance and tax dimension for as long as the tax and / or insurance legislation sets.

c) All other data (under A.1.b) your data (for which the law is not required to be retained for a certain time) are erased within five (5) years of the expiration of the contract or cooperation relationship.

d) After the corresponding (legal) retention period of the Data, we will erase it at our own risk, following the foreseen relative internal procedure of our Company.

(B) POTENTIAL EMPLOYEES

B.1. Purpose of processing - Legitimate basis

Purpose of processing your data [personal identification, (Full name, ID No), home address, contact details (telephone, e-mail address), study and/or vocational training and experience, marital status etc.], is the evaluation of your probability of recruitment by our Company, while its legitimate basis is your consent under art. 6 (1) (a) of the Data Protection Regulation (EU).

B.2. Data Retention Period

In order to fulfil the processing purpose relating to examining your recruitment at a post, we consider it reasonable and necessary to retain your relevant data for a period of twenty-four (24) months. After twenty-four (24) months have lapsed from the time your CV was received, the relevant file with the entirety of your details will be erased.

B.3. Indication

It is noted that before processing your Personal Data to evaluate your probability of recruitment by our Company, you are required to fill in and sign the Employee Candidate Form, while in the case of recruitment to the Company, you may learn more about processing your data and exercising your legitimate rights in the this ***“Privacy and Personal Data Protection Policy Employee”***.

(C) VISITORS IN THE COMPANY'S ESTABLISHMENTS

C.1. Purpose of processing - Legitimate basis

In the context of protecting the security of the persons on the Company's premises, as well as safeguarding and preserving the ownership of the Company's interests,

CCTV operates, which continuously monitors the traffic in these facilities, obtaining data that is relevant to your identification. The observance of the above data (image of visitors - passers-by) takes place in order to preserve the legitimate interests of the Company, which are identical to ensuring the safety of individuals and material objects (for example, building facilities, technical equipment, etc.) which are on the Company's premises. CCTV is installed by posting special newsletters at the Company's premises and updating all data subjects.

The legal basis for the reception, maintenance and general processing of your data is the safeguarding of the legal interests of the Company, which are identical with the security of the persons and the material objects that are on the Company's premises, according to article 6 1 (f) of Regulation (EU) 2016/679.

C.2. Data Retention Period

In order to meet the above processing goal, we consider reasonable and necessary time to maintain your data within fifteen (15) days. After fifteen (15) days from your time of entry at the company's premises, the relevant file with all of your details will be deleted, and in case of a legally and / or critically evaluable event (e.g. theft, robbery) at the expense of the Company's assets, we keep the images in which this event is recorded in a separate record for a period of thirty (30) days.

4. What happens if the above Data is infringed?

We will report any unlawful and proven violation of our Company database to all relevant stakeholders as well as to the competent Supervisory Authority ("DPA"), within seventy-two (72) hours of the breach, if it is obvious that the data of employees, associates, suppliers stored in an identifiable form have become the product of theft.

5. Cookies or other similar technologies

Our website uses cookies so we can distinguish you from other visitors, record your IP address and the way you use our website. This information is used to help us provide you with better services by improving our website design and services. A cookie is a small data file that is placed on your computer's hard drive when you visit a site and helps us improve our site by determining what points are of greater interest to users. You can disable cookies or other similar technologies at any time through

browser options, but if you do, you may not be able to access specific features and services that make your website experience more efficient and enjoyable.

5. Safeguards

We assure you that the Company shall use any technical and organizational Data protection means and shall solely engage in the optimal, minimum and absolutely necessary use and processing of your Data, as required by law, and strictly and exclusively for the purpose for which you have provided them to us.