



ELTON INTERNATIONAL TRADE SA Avlonas, Thesi Draseza, VI.PA. Avlona, 19011, Avlonas Attica, Greece

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PRIVACY AND PERSONAL DATA PROTECTION STATEMENT

ELTON INTERNATIONAL TRADING S.A. ("Company", "we", "us", "our") attaches particular importance to the lawful processing, security, and protection of your personal data, in whatever way you communicate or cooperate with us, as for example prospective or active customers, website visitors, suppliers, commercial or cooperating third parties with any Group company. For this reason, the Company recognizes that the protection and security of your personal data is extremely important and is committed to demonstrating respect for privacy and the protection of such data.

This Statement of Privacy and Protection of Personal Data ("Statement") presents the way in which the Company uses your personal data, as well as the measures which have been taken to protect and keep this data safe. The Statement applies to you if you purchase products or services from us, participate in our events or promotions, or interact in any other way with us, including by using any of our websites or contacting us through social media.

Please read these terms and the relevant Company Security and Privacy Policy carefully. By using our websites and signing the relevant declaration of consent, you unconditionally accept the practices described herein, the terms of which govern the contractual relationship between us and are incorporated into the terms of use of our respective service. Further information indicating further use of your personal data as well as the possibility to opt out, may also be provided during the collection stage of your personal data.

1. Who we are

ELTON is a company that is active in the distribution of chemical products, raw materials of high added value and innovative solutions in the industries of the production of finished products and is located in Greece. The Company, with VAT number 094106501, is based on Thesi Draseza, VI.PA. Avlona, 19011, Avlonas Attica, Greece and is supervised by the Personal Data Protection Authority (PDPA).

2. What is your personal data

Your personal data includes any information in paper or electronic form, which can lead, either directly or in combination with others, to your unique identification or identification as a natural person. This category includes, as the case may be, information such as name, tax identification number, social security number, physical and electronic addresses, landline and mobile telephone numbers, calling and called telephone numbers, recipients of SMS/MMS messages, bank/debit/prepaid card details, e-mail addresses, identification details of equipment or terminal devices, computer, smartphone, tablet, history of your online searches (log files, cookies, etc.), as well as any other information that enables your unique identification according to the provisions of the General Regulation on the Protection of Personal Data (GDPR 2016/679), the implementing Law 4624/2019, the current Greek legislation as well as the decisions of the Personal Data Protection Authority (PDPA).

3. Data we collect and how we use it

- We collect and process the personal data you provide us for the following lawful processing purposes in accordance with the provisions of article 6 GDPR:
 - To serve a legal interest as required to fulfill the services provided or to defend your vital interest
 - Legal Obligation for our compliance with applicable laws and regulations
 - To perform a contract or pre-contractual relationship with you in the context of the transaction between us
 - Based on your express consent where required, which you can withdraw within your rights set out below.
- We do not process personal data without your consent or without you being the customer of the organization or without having provided the business with your data yourself
- We do not collect or process personal data of children under the age of 16
- We only collect the personal data which are essential for the correct and comprehensive provision of the relevant services, such as name, surname, VAT number, public financial service, telephone, e-mail, address, etc. We note that you are responsible for the accuracy of the data you provide to us
- In the context of the transaction between us we may on a case-by-case basis collect data of transactional behavior to ensure commercial credit and reduce potential risks deriving from creditworthiness
- We collect and retain your personal data for as long as required by law in the context of our contractual relationship with you

In any case, we inform you of the processing purposes before the data is collected and all the data we collect is determined by this Privacy and Personal Data Protection Statement. In particular, the Categories and Types of Collected Personal Data that we process are the following:

A. Resume evaluation process: Name, Date of Birth, Telephone Numbers, e-mail, Residential Address, Marital Status, Education Level, Education and Training History, Work History (Experience), Photo

B. Process of managing customers' personal data in the context of commercial activity: Name, Telephone Numbers, e-mail, Address, VAT number, public financial service, bank accounts, financial data (for company customers)

C. Procedure for managing the personal data of suppliers/partners/subcontractors in the context of commercial cooperation: Name, Telephone Numbers, e-mail, Address, Bank accounts, VAT number.

D. Communication process with website visitors: 1. Through cookies: Settings regarding the subject's consent, choices, and behavior of the visitor during browsing, IP address 2. Through a contact form: name, country, phone, e-mail

E. Visitor control procedure at the Company's facilities through a security guard and video surveillance system: Name, Social Security Number, License Plate Number, Image files (moving and static)

4. Principles of collection and processing

This Personal Data Protection Policy aims to inform you about the terms of collection, processing and transmission of your personal data, which we may collect as a controller or processor. The Company and its trained staff apply the ten (10) processing principles of GDPR 2016/679, namely the principles of legality,

objectivity, transparency, purpose limitation, data minimization, accuracy, storage time limitation, integrity, confidentiality, and accountability. The Company protects and ensures your eight (8) rights regarding the processing of your personal data (update, access, correction, deletion, restriction of processing, portability, opposition, and non-automated decision-making based on profiles, as specified in the relevant Greek legislation). The above applies without any discrimination and applies to all the processing we carry out and to all the services we provide either independently or through our subsidiaries.

5. Minimizing, storing, and deleting your data

The Company will always ask you for the minimum personal data required by law in order to connect to our online platforms and services, to purchase products/services, to communicate through websites with other users or to take part in promotions.

Our Company keeps your personal data only for as long as it is required by the contractual terms of each service, in combination with the current legislation, based on the purpose of each processing, while it then proceeds to anonymize or destroy them. If you consent to the use of your data for marketing actions, we retain your data until you request otherwise or withdraw your consent. You can ask us and be informed about what data we collect about you and correct or delete it by filling out a relevant request available, unless its retention is required by law for tax, evidentiary or judicial purposes and for the purpose of prosecution criminal acts.

6. Transmission of your personal data to third parties

As a rule, our Company does not transmit your personal data to third parties, except from the case of acting as intermediaries and to the extent that this is required, in order to complete your order and fulfill requests regarding the services provided by us. Such third parties may be official government and supervisory bodies, such as for example prosecuting and prosecuting authorities, Cybercrime Prosecution, Personal data protection Authority, Independent Public Revenue Authority, supervisory authorities, when we are called upon to comply with the relevant legislative framework and to prevent illegal actions against me and against our customers (e.g. telecommunications fraud, insult, insult to personality, etc.).

In addition, in order to provide our services, we may share your personal data with certain third-party companies acting on our behalf (as executors of processing) in order to provide you with the best service (for example, transport companies, companies providing communication and marketing services, companies providing accounting, consulting or auditing services, etc.). The Company ensures the processing of your personal data by the partners-third companies with contractual clauses limiting the purpose of processing and compliance with the GDPR technical and organizational measures for the correct and safe processing of your personal data.

In addition to the above, third parties may include telecommunications companies, television stations, cloud providers, nursing institutions, professional associations, audio-visual content providers, cruise lines, reservation systems and other global distribution systems.

In our Company, we choose reliable providers and make efforts to set contractual restrictions on third parties who receive your personal data, to ensure their lawful use on behalf of the latter.

For the purpose of processing your data, your personal data may be transferred to third countries and/or outside the European Union pursuant to European Union adequacy decisions, corporate binding rules, standard contracts as well as approved Codes of Conduct.

ELTON will use the e-mail contact information and the name and surname of the User/Customer or other information to directly promote its similar products or services, to inform users about the status of trial applications, as well as to serve similar purposes, except if the User/Customer informs ELTON at the email address info@elton-group.com or at its postal address Thesi Draseza, VI.PA. Avlona, 19011, Avlonas Attica, Greece, that he does not wish the collection and use of his electronic data for these purposes.

Access to personal data is strictly limited to ELTON staff, who apply the appropriate technical and organizational measures, to ensure their appropriate level of security and only to achieve the intended purpose.

7. Security of your personal data

In any case, ELTON takes all appropriate technical and organizational measures to ensure the confidentiality, integrity and availability of the data concerning you, given that we have developed and implemented optimal technical and organizational security and information protection mechanisms with the aim of protecting integrity, availability, and confidentiality thereof. The Company's aim is to ensure that your personal data is transferred, stored, and processed in accordance with appropriate international standards and appropriate security procedures. In the Company we have trained and responsible staff, an Information Security Officer, and a Data Protection Officer, while we recognize the importance of protecting your privacy and all your personal data. To this end, we have appropriate security policies and use appropriate technical and operational tools, such as for example anonymization, pseudonymization, data encryption, tokenization, use of firewalls, establishment of access levels, authorized employees, staff training, periodic audits, compliance with international security and business continuity standards.

8. Unsolicited Commercial Communication

The Company does not permit the use of our website or services to transmit bulk or unsolicited commercial e-mail (spam). Furthermore, we do not allow sending messages from and to our customers that use or contain invalid or falsified headers, invalid or non-existent domain names, techniques to hide the origin of each message, false or misleading information or violate website terms of use.

In any way we do not permit the collection of email addresses or general information of our customers and subscribers through our website or services. We do not permit or authorize any attempt to use our services in a manner that could damage, disable, overburden any part of our services, or interfere with anyone who wishes to lawfully use our services.

In the case of taking place any unauthorized or inappropriate use of any of our services, we may, without notice, in our sole discretion, take appropriate steps to block messages from a particular domain, message server email or an IP address. We have the ability to immediately delete any account using our services that, in our sole discretion, transmits or is associated with the transmission of any messages that violate this Policy.

9. Your Rights

At ELTON we recognize and guarantee your following rights:

- Right to transparent information, to exercise your rights (Article 12, 13, 14 GDPR).
- Right of access (Article 15 GDPR) to the personal data we have collected from you.
- Right to rectification (Article 16 GDPR) of inaccurate personal information we hold about you.
- Right to deletion ("right to be forgotten") (Article 17 GDPR) of the Member-User account and the information we have about you. We should note that the exercise of the right of deletion by an active subscriber implies the inability to continue to provide the services that you may have requested from us.
- Right to restrict the processing of your personal data (Article 18 GDPR) where possible.
- Right to object (Article 21 GDPR) to the processing of your personal data.
- Right to withdraw your already given consent (Article 7 GDPR), i.e. to withdraw your consent at any time for processing based on consent. The lawfulness of the processing of your data is not affected by the withdrawal of consent until the point at which you requested the withdrawal.
- Right to file a complaint with the competent supervisory authority, Personal Data Protection Authority (1-3 Kifisias Street, Athens, P.O. 115 23, +30 210 6475600, contact@dpa.gr).

These rights can be exercised free of charge to you by sending a relevant letter to the Company's Data Protection Officer: Ms. Evangelia Smyrniou, contact details: by phone +30 6975506476, e-mail gdpr.ems@gmail.com. You can also submit your request in writing by sending to the Company's Customer Service Department: ELTON DIETHNOUS EMPORIO A EVE or write to us at the address: Thesi Draseza, VI.PA. Avlona, 19011, Avlonas Attica tel: +302295029350, e-mail: info@elton-group.com.

We ask that your relevant requests be accompanied by appropriate evidence of your personal identification, with the express reservation that the Company may request the provision of additional information in order to identify and confirm your details.

However, in the event that the above-mentioned rights are exercised abusively and without reasonable cause, thereby causing an administrative burden, we may charge you the costs associated with the exercise of the corresponding right.

In the event that you exercise any of your rights, we will take all appropriate measures to satisfy your request within thirty (30) days of receipt of the relevant request. We can either inform you of the acceptance of your request or of any objective reason that prevents the processing of your request.

10. Submission of requests and/or complaints

USEFUL CONTACT INFORMATION					
Role	Appellation	Address	Telephone	Fax	Email
Responsible Processing	HELLENIC INTERNATIONAL TRADE S.A.	Position Drasesza, Industrial Area Avlona, 19011, Avlonas, Attica, Greece	+302295029350		info@elton-group.com
For customer service	HELLENIC INTERNATIONAL TRADE S.A.	Position Drasesza, Industrial Area Avlona, 19011, Avlonas, Attica, Greece	+302295029350		info@elton-group.com
Surveillance Authority	Hellenic Data Protection Authority (HDPA)	Kifissias 1-3, P.C. 115 23, Athens	+302106475600	+302106475628	contact@dpa.gr

11. Applicability of Security and Privacy Policy

This Policy was published by the Company on 27/10/2023 and is subject to periodic improvement and revision.

Policy last revised: 27/12/2023