# **Privacy Policy**

# Introduction

M-STAT is a company providing value-adding telecommunication services in Greece, with significant activity in the mobile business sector.

# **Contact Information**

M-STAT S.A. Software & Communications Provision & Production

Sinopis 6, Athens

11527, Greece

The Company assures that it provides its services with absolute respect for the personal data disclosed to it and guarantees that the processing of all data concerning individuals is carried out with full adherence to the principles of legality, transparency, and accuracy of information, and with full security regarding the confidentiality, integrity, and availability of such data. The Company fully complies with the relevant personal data legislation.

# Processing

a) Collection

M-STAT collects only the personal data that users/members enter upon their registration on the website. Specifically, M-STAT collects the user's/member's email address and the communication protocol address (IP address).

M-STAT applies the principle of authorized access and has designated specific individuals with the right to access the collected data.

b) Purposes of Processing

The purpose of processing is solely to send newsletters from M-STAT to users/members. The Company will process the data until the user/member indicates that they no longer wish to receive newsletters or closes their account. If deletion or account closure is requested, the Company is committed to immediately and permanently deleting the data and/or account of the user/member who requested the deletion or closure.

#### c) Storage Method – Security

The Company makes every effort to protect the personal data it collects from accidental and illegal intrusion, alteration, and destruction, as well as from any other illegal action. For this purpose, the Company is certified with ISO 27001 and uses all prescribed means and security systems. The data is stored on proprietary servers in the Company's datacenter, which operates at an ISO 27001 certified colocation service provider in Attica. All Company systems are protected by firewalls, and data is encrypted during transmission.



In the case of "links" to other websites, www.m-stat.gr is not responsible for the terms of management and protection of personal data followed by these sites.

d) Disclosure - Publication

M-STAT does not disclose the collected data to third parties. However, if requested by the competent authorities through legal procedures, the retained data will be transmitted. The Company will not use other processors (subcontractors) for processing purposes without first obtaining the written (or digital) consent of its members/users. In this case, the Company is committed to contracting with the subcontractors under strict terms regarding the protection of the transmitted data. All M-STAT staff are bound by confidentiality, even after the termination of their contract with the Company.

M-STAT does not transfer your data outside the EEA.

#### **Security Measures**

The Company has appointed a Data Protection Officer (DPO). It also takes all physical, technical, and organizational measures for the secure preservation of data and access to it.

### Cookies

#### **About Cookies**

Cookies are small text files containing information stored in your computer's web browser during your visit to the M-STAT website, and they can be removed at any time. We use cookies for the optimal operation of the m-stat.gr website, proper navigation, login, and movement through the pages. Additionally, we use cookies to analyze how visitors use mstat.gr, how they navigate, or if they encounter any problems so we can fix them, as well as to improve the structure and content of m-stat.gr.

What information do we collect? Cookies and the information collected are categorized as follows:

Absolutely Necessary Absolutely necessary cookies are essential for the proper functioning of m-stat.gr. They allow you to browse and use the site's features correctly. Without these cookies, we cannot offer the effective operation of m-stat.gr.

Targeting Cookies The m-stat.gr website uses the Google Analytics service for statistical purposes. However, the Google Analytics service may use your information to offer you advertisements while you browse other websites.

You can also completely delete cookies by following the instructions below, depending on the browser you use:

Chrome • Safari • Firefox • Internet Explorer

# Inquiries, Requests, Complaints to the Company

Every user/member has the right to access their data upon submitting a relevant request. Additionally, the data subject has the right to: a) challenge the validity of the data, b) request the suspension of retention, withdrawal, prohibition, deletion of their personal data and state the withdrawal of their consent for their retention, c) request and learn about the means of data protection, as well as all detailed processing methods of these data by the Company and request a copy of their data held by the Company, d) file a complaint and seek compensation if they prove that they have suffered damage from the retention of inaccurate, false, outdated, and illegally collected data. They also always retain the right to file complaints with the Data Protection Authority.

The Company will try to respond to each user's/member's requests as soon as possible. A period of one week is considered reasonable.

# **Modification of the Data Protection Policy**

M-STAT reserves the right to unilaterally change the data protection policy. However, in such a case, the user/member will be informed accordingly to provide their consent. If they do not agree, M-STAT will inform them that their data will be deleted.

# **Communication Method**

For any issue related to personal data, you can contact M-STAT in the following ways: telephone (210 3389590), Email: info@m-stat.gr or sms@m-stat.gr.

If you wish to change or delete data, you must send us in writing the exact data you want to be modified/deleted, and in the case of a mere change, the new data you want to be added. However, you can also modify or delete your data by clicking here.

# Jurisdiction

This statement is governed by the provisions of Greek law. For any dispute that may arise regarding personal data, the courts of Athens are exclusively competent, and Greek law is applicable.

# **APPENDIX**

Definitions

- 1. "Personal Data": any information relating to an identified or identifiable natural person ("data subject").
- 2. "Processing": any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 3. "Pseudonymization": the processing of personal data in such a manner that the data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the data cannot be attributed to an identified or identifiable natural person.
- 4. "Filing": the structuring of personal data sets which are accessible based on specific criteria, whether the data sets are centralized, decentralized, or distributed on a functional or geographical basis.
- 5. "Data Subject": the natural person whose personal data is collected. For the purposes of this policy, data subjects are the users/members.
- 6. "Controller": 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. For the purposes of this policy, the Controller is M-STAT.
- 7. "Processor": a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the Controller.
- 8. "Consent" of the data subject: any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her. Consent can be validly given digitally, for example by clicking a checkbox or clicking a link that says "I agree".
- 9. "Personal Data Breach": a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed.
- 10. "Purpose of Processing": the reason for which the Controller carries out the processing.
- 11. "Authorities": all judicial and administrative authorities, independent or not, that according to Community Law and Greek laws have the right to request personal data from the Company.
- 12. "Third Parties": any natural or legal person, public authority, agency, or body other than the data subject, the Controller, the Processor, and persons who, under the direct authority of the Controller, the Processor, or the sub-processor, are authorized to process personal data.
- 13. "Employees-Engaged-Personnel": all natural persons who are directly related to the Company, either through an employment relationship or service provision, who are paid by the Company for the provision of work or services, and not for a project.