

PERSONAL DATA PROTECTION POLICY

This Personal Data Protection Policy (hereafter “**Policy**”) refers to the personal information collected, processed and used by “**CODA S.A.**” (here after “**Company**” or “**We**”) with registered offices at Acharnes Attica (51 October 28th str.)

Introduction

Our Company processes personal data as an employer, prospective employer, supplier of products and services, for marketing related purposes and in the course of its operations and its standard business as a supplier for raw materials for confectionery, bakery and ice-cream.

It also processes personal information when co-operating with third parties / business partners and with respect to the visits to its website (more information on the process through the website available at: www.konta.gr)

Which data we process

We process personal data which include but are not limited to:

- Information referring to the name, tax registration number - tax office, social security number, birth date and place, gender, contact details (full address, email address, phone number), passport, visas and ID numbers, bank details, driver’s license number etc. of our employees, name and tax registration number of their spouses, date of birth and other data evidenced by birth certificates of children and, in general, all information needed for the execution of a contract of employment;
- Information referring to the name, mailing address, telephone numbers and other details and information may be included in an application (such as pictures/photographs, educational qualifications, professional certifications and employment references) of job applicants;
- Information referring to the name, surname, tax registration number - tax office, ID number, operation accounting

number, country of registration, job title and role/function, mailing address (country, town, city, street etc.), phone number, email address etc. of our suppliers (in case of natural persons – individual enterprises) and those of their representatives and/or contact persons (in case of legal entities);

- Information referring to the name, surname, tax registration number - tax office, ID number, operation accounting number, country of registration, job title and role/function, mailing address (country, town, city, street etc.), phone number, email address etc. of our service providers/contractors (in case of natural persons – individual enterprises) or their representatives and/or contact persons (in case of legal entities);
- Information referring to the name and surname, tax registration number – tax office, operation accounting number, country of registration, job title and role/function mailing address (country, town, city, street etc.), phone number, email address etc. of our clients (in case of natural persons – individual enterprises) or their representatives and/or contact persons (in case of legal entities);
- Information referring to the name and surname, birth date, gender, home address/work address, phone number, email address, job title and role/function, years of service, employer’s details, education and professional experience, tax registration number and tax office of participants in seminars and demonstrations of the Company;
- Information about the IP address, browser type and Internet Service Provider, websites

visited, URL referred, date-time-duration of the visit, data extracted and files downloaded etc. of our website visitors.

Special categories of data (“sensitive personal data”)

Where necessary, we may keep information relating to a subject’s health, which could include reasons for absence and /or accident reports, as well as health exams results, medical reports and other health related data and records, as is the case with our personnel, within the framework of the Company’s obligation to have an occupational doctor in place and for the execution of a contract of employment and for reasons of sick pay or leave, etc. and/or group insurance policy, etc.

This information is used in order to comply with our health and safety and occupational health obligations, as well as to prevent professional danger, including in order to consider how an employee’s health affects the ability to work and fulfil the respective employment obligations.

We may also collect this kind of information (e.g. food sensitivities or allergies) for those participating in our seminars and demonstrations, with the purpose to protect and safeguard their life and physical integrity.

All above data and any other data that constitutes special category of data are lawfully collected and processed by the Company and, unless this is not authorized or required by law or such information is required to protect the subject in an emergency, we obtain the subject’s explicit consent.

Where we collect personal data from

The Company collects personal information:

- Directly from the data subject, as is the case with job applicants, employees, clients’ representatives and suppliers’ contact persons etc.;
- From internal sources, i.e. from the several departments of the Company and/or from the Company’s branch in Thessaloniki and/or from our employees (i.e. when

someone recommends to us a job applicant or client or supplier etc.);

- From third parties (including agents, intermediaries, suppliers, business partners, advisors of the Company etc.);
- From publicly accessible sources, such as trade and business registers, other sector’s sources (publications, media, catalogues etc.), within the framework of exhibitions, internet sources, directories or newspapers etc.

Why we process personal data

Personal data is processed by our Company as necessary for the performance of our core business. In particular and as the case may be:

- We process our employees’ and their spouses and children’s personal data in order to fulfil our contractual obligations towards them within the framework of the employment agreement executed between us (i.e. for reasons of wages and social security contributions payment etc.), as well as to comply with legal requirements (i.e. announcement to the authorities, social security payments etc.);
- We process job applicants’ personal data in order to assess their applications and evaluate their overall qualifications and ability to work for us, having eventually prompt consent thereof, in which case they – either directly or through an agency or otherwise in question – have delivered their resume to our Company;
- We process our suppliers’ (in case of natural persons) or (in case of legal entities) their representatives’ and contact persons’ personal data, in order to meet our contractual and legal obligations towards them, within the framework of the supply or services or other commercial agreements executed between us (for reasons of payment, invoicing, delivery of products etc.);
- We process our clients’ (in case of natural persons) or (in case of companies) their representatives’ and contact persons’

personal data, in order to comply with our obligations arising by the business relationship therewith (for reasons of invoicing processing, delivery of products, payment etc.);

- We process our contractors' and service providers' (in case of natural persons) or their representatives' and contact persons' personal data, in order to execute the contracting-services agreements (for reasons of invoicing, payment etc.);
- We process the personal data of those participating in seminars and demonstrations, in order to comply with our contractual obligations towards them (i.e. for reasons of adjusting/customizing the relevant program, invoicing etc.), and occasionally for the protection and safety of their life and physical integrity during the seminars (as is the case when we collect information regarding food allergies etc.).

Without such data, the Company may not be in the position to conclude contracts with suppliers and customers, continue the employee-employer relationship and/or the contractors' agreements etc., as the case may be.

In the cases where the processing is made to fulfill contractual obligations, the purpose of personal data processing is determined by the contract in place with the data subject, whereas in the case where the processing is dictated by law or regulation, the purpose thereof is usually related to provisions of commercial, industrial, trade or tax authorities and bodies or to serve authorities' control purposes.

In certain cases, we need to process personal data to pursue our legitimate business interests, for example to prevent fraud, security breaches or potential crimes, for administrative purposes or to protect the Company's assets and to improve our efficiency (as is the case with our CCTV systems, personal data required for clients' complaints handling etc.).

Where this is the case, we try to never process a subject's data where these interests are overridden by the subject's own interests and

we only use methods and technologies which are absolutely necessary, proportionate and implemented in the least intrusive manner, by appropriate means that ensure a balance with the subject's fundamental rights and freedoms.

We also sometimes process personal data upon the subject's consent (as is the case with those of our employees who consent to the processing of their personal data when voluntarily entering a group insurance policy or with those of our clients who have consented to our sending them newsletters, etc.).

In such cases the data subject may withdraw consent at any time, such withdrawal not affecting, though, the data processing up to the date of the withdrawal.

Monitoring / CCTV surveillance / E-mail correspondence

While on the premises of our Company, a data subject is in certain cases monitored through the use of CCTV system, recording persons' (visitors', employees', clients' or suppliers', associates etc.) images, for reasons relating to the subject's personal safety and integrity and as precautionary/preventive measures against crimes or other possible dangers to the subject and to the Company (i.e. to protect the Company's assets, equipment etc. from theft).

In addition, employees may be granted with use of corporate equipment (e.g. laptops, tablets, mobile devices, etc.), which may be able to be tracked, via pre-installed GPS tracking system. In such cases, the employees provide their consent regarding the data that may be stored or otherwise kept in such equipment as well as for transmission of such data (name, surname, geolocation etc.) to third party companies (e.g. the company repairing or otherwise technically supporting the above equipment).

It might also be that an employee is granted with the use of a corporate car, which might be able to be tracked using GPS tracking system. In such case, the employees provide their consent for their geographical location via the GPS, for further forwarding it to the company that supplies, technically supports or otherwise operates the GPS tracking system and/or to the

company leasing or otherwise providing the Company with the above vehicle, as well as to the vehicle maintenance / repair service provider.

Any personal data (name, address, title/position, contact details) we send and/or receive in our e-mail or other electronic correspondence is processed in compliance with the GDPR and any other applicable law or regulation.

Our Company uses the personal data contained therein and any attachments thereto lawfully, fairly and in a transparent manner; for specified, explicit and legitimate purposes; and the correspondence recipients are duly informed that they have all rights provided for by respective legislation.

How we use and protect personal data

We do not collect more information than we need to fulfil the purposes for which we process personal data.

We hold accurate and up to date data in manners that reasonably ensure appropriate security thereof, protection against unauthorized or unlawful processing, accidental loss, destruction or damage.

We restrict physical access to authorized persons and maintain and use appropriate technical and organizational measures and specified technological solutions and IT systems to protect the integrity, safety, security and availability of the personal data we process.

Automated decision making and profiling

The Company does not use automated decision making for procedures that have legal implications or similarly significant impact on the data subjects and our decisions are made upon human reviewing.

We do not proceed to profiling within the meaning of the applicable personal data legislation.

For how long we retain personal data

Personal data is retained for no more than it is necessary for the purposes for which it is processed for.

When we process personal data based on the data subject's consent, the processing is made for as long as the consent remains valid and until such time it is withdrawn thereby.

Who has access to personal data processed

Personal data is disclosed only to Company's authorized personnel.

We may also disclose personal data to competent authorities, if and insofar this disclosure is mandatory under applicable law (for example: disclosure to tax authorities and to internal or external auditors).

We also disclose personal data to our external consultants, training services providers, business associates and professional advisors (such as lawyers and accountants), as well as to other third parties, if we are legally compelled to do so or where we need to comply with our contractual obligations towards the data subject, (i.e. where we may need to pass on certain information to our insurance associates in case of an accident occurring to an employee-driver).

Our IT structure providers (e.g. software supporting companies etc.) co-operating banks or other financial institutions for credit and account handling etc., as well as our logistics providers (for products delivery to clients etc.), may also have access to personal data.

In all such cases, we provide access where appropriate and only in accordance with applicable laws and we try to ensure that such third parties have undertaken appropriate data processing obligations to ensure the security and confidentiality of the subjects' data.

This is only where an adequate level of protection is ensured or where we have in place safeguards (e.g. using standard contractual terms), or upon explicit consent of the data subject.

In view of continuous development and expansion of our business, we may be involved in mergers and/or acquisitions with other entities, in which cases it is typical to have

personal data entailed in the financial and legal due diligence.

The Company ensures the confidentiality and security of personal data processed with respect to such transactions, by accordingly implementing, in all such cases, personal data protective provisions and/or other safeguards such as non-disclosure obligations and data protection agreements etc.

When we assign data processing

Where the Company relies on a third-party data processor, to execute personal data processing on its behalf, we choose one who provides adequate security level and measures and undertake reasonable steps to ensure compliance of the data processor with such measures, binding ourselves with it with respective data processing agreements.

Future use and update

If in the future we intend to process personal data for a purpose other than that which it has been collected for, we will inform the subject of that purpose and any other relevant information if such purpose is not compatible with the initial, to the extent permitted by law.

Data subject's rights

If and to the extent we process a subject's personal data based on his/her consent, the subject may withdraw consent and request us to stop using and/or disclosing such personal data for any or all of the purposes for which consent has been granted to the Company.

A data subject is also entitled to request access to his/her personal data, i.e. provision of a copy thereof and/or respective information on his/her personal data processed by the Company. The subject may also request rectification of any inaccurate personal data or supplementation thereof, erasure or restriction of processing, as the case may be and under the legal prerequisites thereof. He/she also has the right to object to our Company's processing, if and as the case may be, as well as to receive the data in machine-readable format.

To proceed to submitting the respective applications, as well as for any further query or clarification needed by the data subjects, they may address the Company directly by mail to 51 28th October str., 13673 Acharnes, Attica and/or by tel. to +30 210 2406990 and/or by fax to 210 2460694 and/or by email to info@konta.gr.

The Company acts on such requests free of charge, without undue delay and in any event within one (1) month from receipt of the request. If, however, the request is complicated or there is a large number of requests, the Company will inform the applicants for extension thereof and, in the event that any requests are manifestly unfounded or excessive, for example because of their repetitive character, the Company may either charge a reasonable fee, considering its administrative costs for taking the action requested, or refuse to act on the request.

In the case where any data subject believes his/her personal data protection is breached by the Company, he/she may file a respective complaint before the competent Data Protection Authority (ΑΠΔΠΧ / www.dpa.gr / 1-3 Kifissias Avenue, P.C. 115 23, Athens / tel.: +30 210 6475600 / fax: + 30 210 6475628 / e-mail: contact@dpa.gr).

Changes to this Policy

We reserve the right to make changes to this Policy from time to time.

Regularly reviewing our website ensures that a data subject is always aware of the updated version.

If we make material changes to this Policy, we will promptly provide notification via prominent notice on our website or to the relevant data subjects' category.